

LATHROP & GAGE_{LLP}

US EPA RECORDS CENTER REGION 5



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May 4, 2012

VIA E-MAIL AND FEDERAL EXPRESS

Michelle Kerr
Remedial Project Manager
U.S. Environmental Protection Agency
Superfund Division
77 W. Jackson Blvd., SR-6J
Chicago, IL 60604

Re: Chemetco Superfund Site, Hartford, Illinois
Response to CERCLA § 104(e) Information Request

Dear Michelle:

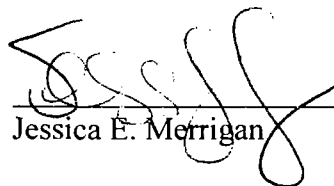
Please find enclosed the response to US EPA's November 30, 2011, CERCLA § 104(e) Request to BFI Waste Services. We appreciate EPA's consideration in allowing the extensions of time to respond.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

LATHROP & GAGE LLP

By:



Jessica E. Merrigan

Enclosures

cc. Tim Benter, Republic Services, Inc.

bkr/JEM

RESPONSE TO INFORMATION REQUEST

1. Provide the following information about your company ("Respondent"):
 - (a) The complete and correct legal name of your company.
 - (b) The name(s) and address(es) of the President and the Chairman of the Board, or other presiding officer of the company.
 - (c) The state of incorporation of the company and the company's agents for service.
 - (d) The name(s) of all subsidiaries, affiliates, or parent companies to your company.
 - (e) The state of incorporation and agents for service of process in the state of incorporation.
 - (f) The status of all subsidiaries, affiliates, or parent companies to your company.

This response is being provided on behalf of Republic Services of Kentucky, LLC, Allied Waste Services of North America, LLC, BFI Waste Services, LLC and BFI Waste Systems of North America, LLC (together the "Respondent") by Respondent's ultimate parent company Republic Services, Inc. through its counsel Lathrop & Gage LLP.

Republic Services, Inc. is a Delaware Corporation with a headquarters address of: 18500 North Allied Way, Phoenix, AZ 85054. The President and CEO is Donald W. Slager, 18500 North Allied Way, Phoenix, AZ 85054.

As of the company's 2010 Annual Report, Republic Services, Inc. had operations nationwide including 400 hauling companies, 242 transfer stations, 78 recycling facilities and 213 landfills.

Because of the company's size and scope, it would be overly burdensome and unlikely to produce relevant or applicable information to respond to this Request on behalf of all of the subsidiaries, affiliates or parent companies or Republic or BFI Waste Services, the addressee of EPA's letter. Instead, Republic has undertaken an investigation into any evidence of transactions related to the Site and, based upon a review of information gathered by Republic and provided by EPA, will focus this Response on those facilities with some evidence of connection to the Site. Accordingly, the Response will focus on the following subsidiary locations:

Republic Services of Kentucky, LLC former materials recycling facility in Louisville, KY, assets of recycling facility sold to S.P. Recycling Corporation on August 6, 2001. Republic Services of Kentucky, LLC is a Kentucky Limited Liability Company with a principal office of 18500 North Allied Way, Phoenix, AZ 85054. This location will be referred to as the Former Louisville Facility.

BFI Waste Services, LLC former Dubuque materials recycling facility located at 1755 Radford Road, Dubuque, Iowa. Following the time period relevant to this Request, this facility was moved to a site called the Delaware Transfer Station. The Delaware Transfer Station was destroyed by fire in May 2008. BFI Waste Services, LLC is a Delaware Limited Liability Company, which also operated under the name Allied Waste Recyclery of Dubuque. The company has a primary address of 18500 North Allied Way, Phoenix, AZ 85054, which is also the address of BFI Waste Services, LLC's President, Brian A. Bales. This location will be referred to as the Former Dubuque Facility.

Allied Waste Services of North America, LLC operates the Inver Grove and Minneapolis materials recycling facilities. Allied Waste Services of North America, LLC is a Delaware Limited Liability Company, with a primary address of 18500 North Allied Way, Phoenix, AZ 85054, which is also the address of Allied Waste Services of North America, LLC's President, Brian A. Bales. These locations will be referred to as the Minneapolis Facilities.

The Former Louisville Facility, Former Dubuque Facility and Minneapolis Facilities will together be referred to as "Respondent's Facilities."

We have included an organizational chart showing the relative relationship of the above named entities.

Please note that Republic's investigation regarding the Site and this Request for Information is ongoing. Republic reserves the right to update this Response if its continuing investigation results in identification of additional responsive information.

2. Describe and provide any documents related to your company's business activities which resulted in sending material to Chemetco.

Respondent currently has no knowledge of documents responsive to this request. Based upon interviews of Respondent's employees, Respondent currently believes that post consumer recyclable steel cans collected at the Former Louisville Facility, Former Dubuque Facility and Minneapolis Facilities may have been sold to Chemetco or to one of its warehouses for a period of months around the 2000 time frame. This was a temporary change from the typical steel recycling facilities utilized by Respondent's Facilities.

3. Describe and provide any documents related to your company's role at the Site, including what duties/involvement your company had at the Site.

Respondent currently has no information or documents responsive to this request.

4. If the nature or size of Respondent's activities in relation to Chemetco changed over time, describe those changes and the dates they occurred.

Based upon interviews of Respondent's employees, Respondent currently believes that post consumer recyclable steel cans collected at the Former Louisville Facility, Former Dubuque Facility and Minneapolis Facilities may have been sold to Chemetco or to one of its warehouses for a period of months around the 2000 time frame. This was a temporary change from the typical steel recycling facilities utilized by Respondent's Facilities.

5. For each type of waste or material used in Respondent's operations, describe and provide documents relating to Respondent's contracts, agreements, or other arrangements for its disposal, treatment, trading, or recycling with Chemetco, including but not limited to whether Respondent controlled where waste sent to Chemetco warehouses was ultimately processed/recycled.

Respondent currently has no information or documents responsive to this request.

6. If not already provided, specify the dates and circumstances when Respondent's waste or material was taken to the Site, and identify the companies or individuals who brought Respondent's waste/material to the Site. Provide any documents which support or memorialize your response.

Respondent has not found any documents in its files related to shipment of materials from Respondent's Facilities to the Site or its warehouses.

Documents produced by EPA indicate that post consumer recyclable steel cans were sold by the Former Louisville Facility, Former Dubuque Facility and Minneapolis Facilities to Chemetco, either at the Site or to one of its warehouses, during 2000 and 2001.

Based upon interviews of employees who worked at the Minneapolis Facility during the relevant time frame, Respondent currently believes that post consumer recyclable steel cans collected at the Former Louisville Facility, Former Dubuque Facility and Minneapolis Facilities may have been sold to Chemetco, either to the Site or to one of its warehouses, for a period of months around the 2000 time frame. This was a temporary change from the typical steel recycling facilities utilized by Respondent's Facilities.

7. Were transactions between your company and Chemetco and specifically the Site: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date?

Respondent currently has no knowledge of documents related to transactions between Respondent and Chemetco. However, based upon interviews of Respondent's employees regarding Respondent's common practices, Respondent currently expects that any such transactions would have been outright sales.

8. Did your company have any influence over waste disposal or recycling activities at the Site? If so, how?

Respondent currently has no knowledge of any influence by Respondent over waste disposal or recycling activities at the Site.

9. Was any shipment of material sent to the Site by Respondent ever refused and/or returned? If so, describe this event in detail, including its cause and outcome.

Respondent currently has no knowledge of any material ever shipped by Respondent and refused at the Site or one of its warehouses and/or returned.

10. Describe in detail the types of material that you sent for recycling, processing, or disposal at the Site. In your response, please also give the generic name of each type of materials shipped to the Site [e.g., scrap metal (including scrap automobiles), batteries, electronics, scrap paper, scrap plastic or scrap textile, etc.].

Based upon information provided by EPA and interviews with Respondent's employees, the material potentially sold to Chemetco, whether it went to the Site or one of the warehouses, by Respondent consisted of what is generally described as "tin cans," post consumer recyclable steel cans. Respondent's Former Louisville Facility, Former Dubuque Facility and Minneapolis Facilities each collected post-consumer residential food and beverage cans from household recycling collection and sold such cans for recycling. These food and beverage cans collected from residential recycling are generally called "tin cans" and consist primarily of steel cans, some with tin.

- (a) Identify whether the materials were delivered directly to the Site or were trans-shipped there from another intermediate delivery point. If applicable, describe each such delivery point.

Respondent currently has no information responsive to this Request.

- (b) State whether any of the material was ever tested by your company and if so, whether the substances exhibited any of the characteristics of a hazardous waste identified in 35 Illinois Administrative Code 721, Subpart C or 40 C.F.R. § 261, Subpart C.

Respondent currently has no knowledge of any testing conducted by Respondent of the post consumer recyclable steel cans that were collected at each of Respondent's Facilities. Respondent's Facilities are/were materials recycling facilities that collected household recyclables including the post consumer recyclable steel cans, which were food and beverage containers. Based upon the identity of the materials, Respondent has no knowledge of any applicable testing requirement.

- (c) Describe what was done to materials once they were brought to the Site, including any further processing of the materials.

Respondent currently has no information responsive to this Request.

- (d) Provide any additional information and all documents that you believe are related to the type, nature and characteristics of the materials you sent to the Site.

The Steel Can Recycling Institute (later Steel Recycling Institute) publicly and routinely advertised to community groups, municipalities, and material recovery facilities that the type, nature and characteristics of post-consumer steel cans collected from source separated residential recycling programs to be entirely recyclable. Post-consumer steel cans (predominantly food-grade steel cans) are collected for recycling across the entire United States. The attached 2-page circular dated 4/96 published by the Steel Recycling Institute summarizes information regarding the description, collection and recycling of steel cans pertinent to the period when post consumer cans were being delivered to Chemetco.

The chemistry and relative consistency of the steel can (essentially iron with a de minimis amount of other elements) meets the definition of a recyclable scrap metal under RCRA.

A post consumer steel can primarily consists of iron with a certain not-to-exceed minor amount of other elements, and as such is recyclable and a complete useful product.

Furthermore, numerous information and publications were provided by governmental agencies such as the Illinois and US Environmental Protection Agencies promoting the recycling of post-consumer recyclable materials, including post-consumer steel cans. One example is a USEPA document published in January, 1994 titled "How to Start or Expand A Recycling Collection Program (EPA530-F-94-007). This document stated in part "tin/steel cans . . . are readily recyclable."

- (e) List the years in which your company sent materials to Chemetco and/or its broker(s) for recycling, processing, or disposal.

Based upon information provided by EPA and interviews with Respondent's employees, Respondent currently believes that materials were sent to Chemetco or to one of its warehouses during 2000 and 2001.

Questions and Requests for Documents Related to Scrap Metal

11. For the following questions which relate to transactions involving scrap metals, provide the requested information, and also provide copies of any documents that contain any information that is related to the response:

- (a) Did a market exist for the scrap metal listed in your response to No. 10 above? If so, describe the nature of such a market at the time of the transaction (possible uses, possible consumers, etc.) and the source of the commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).

Yes. Tin cans are widely recycled. See, for example <http://www.cancentral.com/recFAQ.cfm>, which notes that “The recycling of cans outpaced the recycling of all other containers. Steel cans lead the way with a recycling rate of 63 percent followed by aluminum cans with a recycling rate of 52 percent.”

Multiple markets existed and continue to exist for baled source separated post-consumer recyclable steel cans. Numerous companies solicited, and continue to solicit, Republic Services to procure and purchase baled post-consumer recyclable steel cans. Companies that have purchased the exact same steel cans from Respondent during the relevant time frame include: AMG Resources Corporation; Omni Source; Tube City, Inc.; and Great Western Recycling Industries.

Furthermore, numerous information and publications were provided by governmental agencies such as the Illinois and US Environmental Protection Agencies promoting the recycling of post-consumer recyclable materials, including post-consumer steel cans. One example is a USEPA document published in January, 1994 titled “How to Start or Expand A Recycling Collection Program (EPA530-F-94-007). This document stated in part “tin/steel cans are readily recyclable.”

- (b) What commercial specification grade did the scrap metal listed in your response to question No. 10 meet? Identify/list the commercial specification grades that each scrap metal identified in No. 9 met.

Respondent currently has no information responsive to this Request.

- (c) At the time of the transaction(s) what was the intended disposition of the scrap metal listed in your response to question No. 10? Did this include burning as fuel, or for energy recovery, or incineration?

Tin cans are recycled for use as replacement for raw steel, including use in car components. Tin cans are not burned for fuel, used for energy recovery or incinerated. See, for example <http://www.cancentral.com/recFAQ.cfm>, which notes that “Steel cans are recycled at a rate of 63 percent. Two out of three pounds of new steel are produced from old steel.”

- (d) After sale, transfer, delivery, recycling, or disposal, what portion of the scrap metal listed in your response to question No. 10 was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.

Respondent currently has no information responsive to this Request.

- (e) Could the scrap metal listed in your response to question No. 10 have been used as a replacement or substitute for a virgin raw material? If so, provide details.

Tin cans are recycled for use as replacement for raw steel, including use in car components. Tin cans are not burned for fuel, used for energy recovery or incinerated. See, for example <http://www.cancentral.com/recFAQ.cfm>, which notes that "Steel cans are recycled at a rate of 63 percent. Two out of three pounds of new steel are produced from old steel."

- (f) Could any products made from the scrap metal listed in your response to question No. 10 have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.

Tin cans are recycled for use as replacement for raw steel, including use in car components. Tin cans are not burned for fuel, used for energy recovery or incinerated. See, for example <http://www.cancentral.com/recFAQ.cfm>, which notes that "Steel cans are recycled at a rate of 63 percent. Two out of three pounds of new steel are produced from old steel."

- (g) Did your company melt the scrap metal listed in your response to question No. 10 before it was transported/delivered to the Site? If yes, describe the process used for melting the scrap metal.

No.

- (h) Describe the source of or the process that produced the materials sent to the Site.

Respondent's Facilities are / were materials recycling facilities that collect post-consumer residential recyclable materials. Respondent sorts the materials and sells materials by type to appropriate locations for processing / use.

12. Did any of the scrap material sent to the Site contain other material(s) incident to or adhering to the scrap? If so, describe in detail.

Respondent is not aware of any material adhering to the post-consumer recyclable steel cans other than, perhaps, de minimis amounts of post-consumer food residue adhering to the inside of the steel can, and paper labels wrapped around the cylindrical portion of the steel can, which was and continues to be acceptable to steel can recycling industries.

13. Did any of the material sent to the Site contain wire or wiring? If so, was the wire's insulation first stripped before being shipped to or accepted at the Site, after being received at the Site, or was the wire not stripped?

It is Respondent's typical practice to bundle steel cans into 2,000 pound bundles which are secured with steel baling wire that contains no insulation.

14. Did the material shipped include drums or shipping containers? If so, specify the generators of the drums or shipping containers, the capacity of such drums or containers and whether such containers ever contained liquid of any sort. If so, specify the type of liquid and whether such liquids contained wastes of any kind.

Respondent is not aware of any drums or shipping containers that would have been included in the shipments.

15. Describe all efforts (i.e., Site visits) taken by your company to determine what would be done with the scrap metal identified in your response to question No. 10.

Respondent has not located information or documents specific to the Site. However, it is Respondent's practice to obtain a Dunn & Bradstreet report and perform a site visit in advance of entering into a contract with a recycling facility.

Questions and Request for Documents Related to Electrical and Electronic Equipment

16. For the following questions which relate to transactions involving electrical and electronic equipment (e.g., transformers, capacitors, white goods, computers, monitors, cables, circuit boards, or other electrical equipment), provide the requested information, and also provide copies of any documents that contain any information that is related to the response:

Not Applicable.

- (a) List an estimated number of shipments of electrical and electronic equipment your company sent to the Site on an annual basis and list the years. In this list, include the type and quantity, volume and weight of electrical and electronic equipment sent;
- (b) At the time of the transaction(s), what was the intended disposition of the electrical and electronic equipment listed in your response to question 15(a)? Did the intended disposition include burning as fuel or for energy recovery or incineration?

17. With respect to waste or materials sent to the Site, at the time of the transactions, specify the measures you took to determine the actual means of treatment, disposal, recycling, or other uses of the material. Provide information you had and any documents relating to the treatment, recycling and disposal practices of Chemetco at the Site. What assurances, if any, were you given by the owner/operator of the Site regarding the proper handling and ultimate disposition of the materials you sent there, as well as its compliance with

applicable environmental laws? Include in your response any correspondence to and from Chemetco relating to this topic and dates the measures were taken or assurances were given.

Because Respondent has not identified any documents related to the Site, Respondent currently has no information responsive to this Request. However, it is Respondent's practice to obtain a Dunn & Bradstreet report and perform a site visit in advance of entering into a contract with a recycling facility. Further, the collection and processing of post-consumer recyclable steel cans for use as replacement for raw steel was industry standard, as discussed above.

18. What efforts and when, if any, did you take to investigate the nature of the operations conducted at the Site and the environmental compliance of the Site prior to selling, transferring, delivering disposing of, trading, or arranging for the treatment, recycling, or disposal of any materials?

Because Respondent has not identified any documents related to the Site, Respondent currently has no information responsive to this Request. As noted above, it is Respondent's practice to obtain a Dunn & Bradstreet report and perform a site visit in advance of entering into a contract with a recycling facility.

19. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding the recycling of materials, particularly Section 127 of CERCLA, 42 U.S.C. § 9627, sent to the Chemetco Site.

Respondent is not currently aware of federal environmental regulations or standards applicable to Respondent's collection, handling and sale of post-consumer residential recyclable cans. However, Respondent's practice in selecting facilities was based upon regional marketing decisions that took into account demand and pricing for the products collected and sold by Respondent, as is customary in the industry.

20. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding scrap metal promulgated under Resource Conservation and Recovery Act (RCRA).

Respondent is not currently aware of any RCRA regulations applicable to Respondent's collection, handling and sale of post-consumer residential recyclable cans.

21. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

The Allied Waste Services Minneapolis Facility is a Conditionally Exempt Small Quantity Generator with a RCRA ID of MNR000010603.

The Allied Waste Recyclery in Inver Grove, Minnesota is a Small Quantity Generator with a RCRA ID of MNR000010587.

Respondent has not identified RCRA ID numbers relevant to the Former Dubuque and Former Louisville Facilities.

22. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 *et seq.*, (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 *et seq.*, (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 *et seq.*

Other than RCRA reporting under the RCRA Identification numbers identified in Response 21, Respondent has not currently identified any other reports submitted by Respondent under federal or state environmental laws and regulations.

23. Identify the federal and state offices to which such information was sent. State the years during which such information was sent/filed.

See Responses 21 and 22.

24. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

Respondent would suggest that individuals associated with the Chemetco Site may have more information related to operations at that Site. Additionally, S.P. Recycling may have information relevant to operations at Respondent's Former Louisville Facility.

25. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained. If the records were destroyed, provide us with the following:

- (a) the document retention policy between 1970 and 2001;

The document retention policy prior to 1992 is unknown. In 1992, and perhaps earlier, the BFI document retention policy was ten years for scale tickets, bills of lading, and accounting records, after which documents were destroyed. The document retention policy was changed to seven years when Allied acquired BFI in 1999 as that was Allied's document retention policy at that time. It remained at seven years through 2001. The Republic document retention period is currently seven years, though the policy in place through

2007 provided for destruction of customer service agreements and purchase orders after three years and scale tickets after one year. We have enclosed the available document retention policies, the legacy Allied Waste Document Retention Policy issued in 2002, updated through 2008, the legacy Republic Document Retention Policy through 2007, and Republic's current Document Retention Policy.

- (b) a description of how the records were destroyed (burned, trashed, etc.) and the approximate date of destruction;

Consistent with the legacy Allied Waste Document Retention Policy issued in 2002, updated through 2008, and Republic Document Retention Policy (through 2007 and current), after seven years, hard copies of scale tickets, bills of lading, and all accounting records, are shredded and disposed of. Therefore, documents related to transactions from 2000-2001, the dates of the alleged transactions, were destroyed around 2007-2008. However it is possible that documents related to the Former Louisville Facility were destroyed earlier consistent with the legacy Republic document retention policy.

- (c) a description of the type of information that would have been contained in the documents;

For the sale of recyclable materials from Respondent's Facilities, the materials recycling facility would have created scale tickets documenting the product make up and bundle weight, along with bills of lading for each shipment of the materials to a buyer. An agreement with a buyer for the sale of recyclable materials would have been documented by the Recycling Marketing Group through monthly Purchase Orders including the agreed upon pricing and identification of the material.

- (d) the name, job title and most current address known by you of the person(s) who would have produced these documents, the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for the destruction of these documents; and the person(s) who had and/or still may have the originals or copies of these documents; and

Respondent has identified the following current employees who would have had responsibility for production of at least some of the above described documents at or for the Former Louisville Facility, Former Dubuque Facility and Minneapolis Facilities: Kate Steinke; Matt Augustson; and Kurt Blascoe.

- (e) the names and most current address of any person(s) who may possess documents relevant to this inquiry.

Respondent has not identified any person(s) who may possess documents relevant to this inquiry.

26. Please state the name, title and address of each individual who assisted or was consulted in the preparation of the response to this information request.

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We would ask that all correspondence be directed to Respondents' outside counsel.



The familiar metal cans we take for granted in everyday life are made of the most recycled material: steel. This includes coffee cans, meat and vegetable cans, pet food cans, paint cans, aerosol cans and even decorative cookie tins. Call them "tin" cans or steel cans, they are all the same thing—recycled and recyclable.

In 1995, steel cans were being recycled at a rate of 55.9 percent. This rate is steadily increasing through the combined efforts of steel mills, foundries, detinners and other broker/processors and the Steel Recycling Institute (SRI). Steel can recycling is important not only to steelmakers for flat-rolled products, but also heavy steel products, because steel cans have earned a role as a new and valuable source of scrap for the industry.

The steelmaking process requires steel scrap to produce new steel. For decades, worn-out cars, used appliances and old construction materials have been remelted to make new steel products. With curbside and drop-off recycling programs providing convenient access to recycling for many Americans, steel cans are now an available and desirable scrap grade.

The SRI develops and improves the infrastructure for steel can recycling by ensuring continuation of the three steps in recycling: collection, processing and end market consumption. Established originally in 1988 as the Steel Can Recycling Institute, one of the first challenges was to identify and expand steel can recycling markets, including steel mills and foundries in the United States and Canada. The SRI, through its seven regional offices, works extensively with these end markets to provide them with the benefits of melting steel can scrap, as described herein. The SRI also provides detinners and other secondary processors of steel cans with information about these end markets and the curbside and drop-off collection source contacts.

Earlier in this century, the steel industry did not typically use steel can scrap unless it was first detinned. At that time, the amount of tin used as a coating on steel cans was fairly high and would have changed the mechanical properties of steel if used as a scrap source of significant proportion. In the 1940's, for example, one ton of steel cans contained more than 50 pounds of tin as a coating. Today's steel can has an almost negligible tin coating, with less than four pounds in one ton of steel cans. At this level, post-consumer steel cans are being used directly in the melt by the steel and foundry industries.

Collecting Steel Can Scrap

With only the notable exception of World War II scrap metal drives, steel cans have previously not been available

The Benefits of Steel Can Scrap

in sufficient quantity to warrant serious scrap usage. Steel cans now, however, move easily from what would have been municipal solid waste to scrap material for end market consumption. It starts with the local recycling program, where steel cans are collected and initially processed. There are several types of recycling programs.

One of the most common programs today is the residential curbside recycling program. Residents place their recyclables at the curb for collection by a hauler and transportation to a material recovery facility (MRF), where the steel cans are magnetically separated from the other materials. Over 175 million Americans have access to curbside recycling today.

Because participants in recycling programs are careful about rinsing their cans before placing them in the recycling bin, the cans are usually very clean. Since there is no practical reason for removing labels, the SRI encourages program operators to allow their participants to leave labels on the steel cans they collect. Flattening the cans at home is optional as well. Also, the ends of the cans do not have to be removed. This encourages recycling by keeping it simple.

A companion to residential curbside recycling is dockside recycling for the commercial and institutional sectors where steel food cans (usually large one-gallon cans) are collected from restaurants, hotels, schools, military bases and other food service operations. Dockside recycling is only in its infancy and yet an area of major developmental opportunity. Recyclables collected at dockside are usually hauled to a MRF where they are processed with the residential materials.

In addition to curbside and dockside recycling, there are many voluntary drop-off and buyback centers that accept steel cans. As the name suggests, voluntary drop-off programs are those in which participants bring their recyclable materials to a collection site. In a buyback operation, consumers are paid for their recyclables, although some materials may be accepted on a donation basis, including steel cans. Depending on the size of the drop-off or buyback operation, the steel cans may be hauled locally to a MRF or another secondary processor. Occasionally, they may go directly to nearby steel mills or foundries.

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**For more information, please
contact the Public and Education
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In many metropolitan areas, steel cans are recycled automatically through resource recovery facilities. These modern, highly sophisticated waste-to-energy plants combust municipal solid waste while recovering the energy for steam and electricity generation. The solid waste itself is reduced in volume by as much as 90 percent. Either before or after combustion, depending on the plant type, the steel is magnetically separated. The scrap is then beneficiated by a specialty secondary processor to remove ash or residue and sold to end market.

Processing Steel Can Scrap

Regardless of the type of recycling program, steel cans must be prepared by a secondary processor for use by end markets. MRFs initially process the steel cans for shipment to another secondary processor or for direct use by local end markets. MRFs typically bale cans in a horizontal baler with a density of about 30-50 pounds per cubic foot. This loose, wire-wrapped bale is sometimes called an HRB bale. The steel can scrap specification depends on the needs of the end market itself. The type of equipment used by the initial processor may not be adequate for the consumer. In many cases the loose bale must be re-squeezed into a tighter, high density bale at 60-75 pounds per cubic foot. Steel cans may also be flattened or shredded, if required. Following processing, the steel cans are a desirable scrap source for steelmaking or foundry operations.

Melting Steel Can Scrap

Price

In addition to their superior chemistry described below, steel cans used in the melter's scrap mix provide a relative cost advantage. Steel cans approximate a #2 bundle in price. Steel cans tend to average down the overall cost of the scrap mix while also providing predictable chemistry.

Predictability

The predictability of scrap quality is paramount. The known, consistent and homogeneous scrap chemistry afforded by steel cans is a fact of metallurgy now being realized by more melters. Shown on the following page is Table 2 from ASTM Specification A623, which outlines the chemistry of tin mill products (the sheet steel from which steel cans are made). Type L steel, a mild, low carbon steel, represents more than 95 percent of all the sheet steel made for tin mill products. As a very critical application, the steel used in making cans is among the highest quality grades of steel made.

In addition to the chemistry of the substrata steel sheet itself, the coating chemistry must be considered. Per gross ton of post-consumer steel cans, there are about four pounds of tin or 0.002 by weight, or 0.20 percent. Its percentage composition is low because about one-third of

the modern steel can sheet is tin-free steel, using instead an extremely light chromium wash for corrosion protection instead of tin. Thus, with the tin content of cans considerably lower than its historical past, it is of minimal significance when it is blended with other sources of scrap in the basic oxygen furnace (BOF) or electric arc furnace (EAF) operations. Furthermore, foundry operations welcome the presence of this slight amount of tin as a cost-saving alternative to the addition of copper to achieve stabilization of pearlite, improving yield and tensile strengths.

Chemical Requirements for Tin Mill Products

Element	Type D	Type L	Type MR
Carbon	0.12	0.13	0.13
Manganese	0.60	0.60	0.60
Phosphorus	0.020	0.015	0.020
Sulfur	0.05	0.05	0.05
Silicon	0.020	0.020	0.020
Copper	0.20	0.06	0.20
Nickel	0.15	0.04	0.15
Chromium	0.10	0.06	0.10
Molybdenum	0.05	0.05	0.05
Other elements (ea.)	0.02	0.02	0.02

Public Relations

Given the above described predictability and pricing, the public relations value to a melter of using steel cans from a local recycling program is an important component which should not be overlooked. When a melter provides the local recycling program with an industrial end market for its cans, it shows support of the recycling program and the community-at-large. The average citizen does not readily identify with most forms of steel scrap, but sees steel cans as part of everyday life and a routine item collected for recycling. A mill or foundry that has always "recycled" will suddenly get credit for doing so as the local population makes the connection. This unique partnership may also spark the interest of the local media, whose coverage will provide both the local recycling program and the melter with positive exposure throughout the community. The same beneficial public relations are also enjoyed by the melter who receives steel can scrap from more distant programs.

The Role of the Steel Recycling Institute

Headquartered in Pittsburgh, Pennsylvania, the SRI has regional offices throughout North America. The role of the SRI is to develop and improve steel recycling by helping the buyers and sellers of steel can scrap secure mutually beneficial relationships and by raising public awareness of steel can recycling. The SRI, with its wealth of local contacts and educational information, also serves as a resource to the recycling community. If you are interested in more information, call the Steel Recycling Institute at 1-800-876-7274.

RECORD RETENTION*Policy and Control Manual*

Date Issued:	July 1, 2002	Date Revised:	April 29, 2008
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SCOPE OF POLICY

This policy sets forth the proper retention periods of Company documents.

POLICY

It is the policy of the Company to retain all records for at least the minimum period as stated in applicable state and federal laws or regulations. All records that may substantially affect the obligations of the Company are to be retained for a period of time, which will reasonably assure the availability of these records when needed.

The Internal Revenue Service, government regulatory agencies and auditors have established guidelines for maintaining various records and documents. To ensure that the Company complies with these requirements, the retention periods are included in this policy.

The originals of the described records, along with those workpapers that support the completed transactions, must be maintained at the location where the records were made unless they were delivered at the request of the Corporate Legal Department. The retention period applies to final work product and unless otherwise instructed, all drafts must be destroyed once the final version is approved.

Documents should be retained for the period of time specified and no longer. The only exception to these retention periods is if the Company notifies employees that the records are related to litigation or an official investigation. In that instance, the records may not be destroyed until the litigation or investigation is concluded. Employees should contact the Corporate Legal Department at (480) 627-2714 if they have questions about how to apply the retention periods or whether records may be destroyed pursuant to this policy. **All references to "Corporate" throughout this policy refer to the Office Support Center (OSC).**

Confidentiality

All records are the property of the Company, and employees are expected to hold all business records, including all customer information and employee records, in confidence and treat them as Company assets. Records must be safeguarded and may be disclosed to parties outside the Company only upon proper authorization by the Company or pursuant to a court order or subpoena. Any subpoena received by employees or questions regarding the release of Company records must be directed to the Corporate Legal Department prior to the release of such records. Any records of the Company in the possession of an employee must be returned to the employee's supervisor upon termination from the Company.

**[THE FOLLOWING IS A LISTING OF THE REQUIRED RETENTION PERIODS
FOR THE SPECIFIED COMPANY RECORDS]**

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RECORD RETENTION PERIODS

The record retention period for documents of a more general nature begins below. The retention period refers to the number of years a record needs to be maintained after it becomes inactive. The Corporate Legal Department may request the extended retention of certain records that relate to pending or threatened litigation. In those cases, the retention period expressed in this policy is to be automatically extended beyond the indicated retention period, and the specific records should be maintained until notified that they may be destroyed. If employees have been previously requested to keep certain records, they must not destroy those records until verified with the Corporate Legal Department that the records may be destroyed.

Certain documents as listed herein are required to be stored in electronic format (as noted with one asterisks (*)) or on CD-ROM (as noted with two asterisks (**)). Documents with no asterisk(s) listed are to be retained manually or hard copy. All references to "Corporate" throughout this policy refer to the Office Support Center (OSC).

IMPORTANT NOTE FOR TAX HOLD REQUIREMENTS AS REFERENCED BELOW UNDER RETENTION PERIOD: Due to document retention requirements associated with the Company's tax filings, all records which are identified below as subject to "Tax Hold" and which were prepared or created on or after January 1, 1998 (on or after October 1, 1995 with respect to former BFI records) must be retained beyond the otherwise applicable retention period until notified in writing that the records are no longer subject to a Tax Hold. Records prepared or created prior to these dates may be destroyed in accordance with the otherwise applicable retention period. Employees should contact the Corporate Vice President, Tax at (480) 627-2779 if they have any questions regarding this requirement.]

CORPORATE ACCOUNTING (Does Not Apply to Field)	RETENTION PERIOD
Accounts Payable Payment History*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Accounts Payable Trial Balances*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Accounts Receivable Trial Balances*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Audit Reports and Workpapers (Internal Audit)	7 years
Audit Reports (Environmental, Health and Safety) (<i>Workpapers destroyed upon completion of audit</i>)	Shorter of Last Audit or 7 years
Balance Sheet Reconciliations	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Bank Statements and Reconciliations	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Budget/Plans (Final Versions) (<i>Drafts destroyed after final version approved</i>)	3 years
Cash Receipt Logs and Check Copies	Longer of Tax Hold or 7 years (See Above Tax Hold Note) [<i>However, for checks forwarded to a lockbox, the retention period for hard copies is 3 months</i>]

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RECORD RETENTION

Policy and Control Manual

Date Issued:	July 1, 2002	Date Revised:	April 29, 2008
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SCOPE OF POLICY

This policy sets forth the proper retention periods of Company documents.

POLICY

It is the policy of the Company to retain all records for at least the minimum period as stated in applicable state and federal laws or regulations. All records that may substantially affect the obligations of the Company are to be retained for a period of time, which will reasonably assure the availability of these records when needed.

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[THE FOLLOWING IS A LISTING OF THE REQUIRED RETENTION PERIODS FOR THE SPECIFIED COMPANY RECORDS]

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CORPORATE ACCOUNTING (Does Not Apply to Field)	RETENTION PERIOD
Accounts Payable Payment History*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Accounts Payable Trial Balances*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Accounts Receivable Trial Balances*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Audit Reports and Workpapers (Internal Audit)	7 years
Audit Reports (Environmental, Health and Safety) (<i>Workpapers destroyed upon completion of audit</i>)	Shorter of Last Audit or 7 years
Balance Sheet Reconciliations	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Bank Statements and Reconciliations	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Budget/Plans (Final Versions) (<i>Drafts destroyed after final version approved</i>)	3 years
Cash Receipt Logs and Check Copies	Longer of Tax Hold or 7 years (See Above Tax Hold Note) <i>[However, for checks forwarded to a lockbox, the retention period for hard copies is 3 months]</i>

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CORPORATE ACCOUNTING (cont'd) (Does Not Apply to Field)	RETENTION PERIOD
Checks (Cancelled**/Voided*)	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Customer Account Activity*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Customer Invoices*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Customer Manually Billed Invoices	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Deposit Slips	Longer of Tax Hold or 3 years (See Above Tax Hold Note)
Employee Leave Records	3 years
Expenditure Requests and Approvals (Capital Expenditures)*	Longer of Tax Hold or 3 years (See Above Tax Hold Note)
Expenditure Requests and Approvals (Landfill)*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Expense Reports	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Financial (Ad Hoc) Analysis (<i>Drafts destroyed after final version approved</i>)	1 year
Financial Forecasts, Projections and Similar (Final Versions) (<i>Drafts destroyed after final version approved</i>)	1 year
Financial Statements (Monthly)*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Financial Statements (Year End)*	Permanently
Fixed Asset Listings*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Fixed Asset Additions, Dispositions and Changes	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Fixed Asset Physical Inventories	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
General Ledgers*	Permanently
Journal Entries (Including Support Documents)	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Landfill Accounting Model	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Paid A/P Documents (Invoices, PO's and Receiving Records)	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Payroll Input Documents (Input Sheets)	Longer of Tax Hold or 3 years (See Above Tax Hold Note)
Payroll Register** and Reports ⁽¹⁾	Longer of Tax Hold or 7 years following the latest due date for the last required filings (i.e., Forms 5500, Schedules SSA, etc.) with the IRS or Dept. of Labor with respect to employee benefit plans, or if later, 7 years following the last payment to participants or beneficiaries from the plan (See Above Tax Hold Note)

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CORPORATE ACCOUNTING (cont'd) (Does Not Apply to Field)	RETENTION PERIOD
Payroll Tax Returns	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Payroll W-2's and Withholding Tax Statements	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Vendor W-9's	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Unclaimed Property Transactions and Returns	7 years

FIELD ACCOUNTING (Does Not Apply to Corporate)	RETENTION PERIOD
Accounts Receivable Adjustments and Write-offs	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Balance Sheet Reconciliations	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Bank Statements and Reconciliations	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Cash Receipt Logs and Check Copies	Longer of Tax Hold or 7 years (See Above Tax Hold Note) <i>[However, for checks forwarded to a lockbox, the retention period for hard copies is 3 months]</i>
Customer Automatic Payment Authorizations	3 years after last payment
Customer Manually Billed Invoices	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Customer Refunds	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Deposit Slips and Substitute Remittance Advices	Longer of Tax Hold or 3 years (See Above Tax Hold Note)
Employee Leave Records	3 years
Expense Reports	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Fixed Asset Additions, Dispositions and Changes	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Fixed Asset Physical Inventories	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Journal Entries (Including Support Documents)	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Paid A/P Documents (Invoices, PO's and Receiving Records)	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Payroll Input Documents (Input Sheets)	Longer of Tax Hold or 3 years (See Above Tax Hold Note)

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CORPORATE ACCOUNTING (cont'd) (Does Not Apply to Field)	RETENTION PERIOD
Checks (Cancelled**/Voided*)	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Customer Account Activity*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Customer Invoices*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Customer Manually Billed Invoices	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Deposit Slips	Longer of Tax Hold or 3 years (See Above Tax Hold Note)
Employee Leave Records	3 years
Expenditure Requests and Approvals (Capital Expenditures)*	Longer of Tax Hold or 3 years (See Above Tax Hold Note)
Expenditure Requests and Approvals (Landfill)*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Expense Reports	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Financial (Ad Hoc) Analysis (<i>Drafts destroyed after final version approved</i>)	1 year
Financial Forecasts, Projections and Similar (Final Versions) (<i>Drafts destroyed after final version approved</i>)	1 year
Financial Statements (Monthly)*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Financial Statements (Year End)*	Permanently
Fixed Asset Listings*	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Fixed Asset Additions, Dispositions and Changes	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Fixed Asset Physical Inventories	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
General Ledgers*	Permanently
Journal Entries (Including Support Documents)	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Landfill Accounting Model	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Paid A/P Documents (Invoices, PO's and Receiving Records)	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Payroll Input Documents (Input Sheets)	Longer of Tax Hold or 3 years (See Above Tax Hold Note)
Payroll Register** and Reports ⁽¹⁾	Longer of Tax Hold or 7 years following the latest due date for the last required filings (i.e., Forms 5500, Schedules SSA, etc.) with the IRS or Dept. of Labor with respect to employee benefit plans, or if later, 7 years following the last payment to participants or beneficiaries from the plan (See Above Tax Hold Note)

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CORPORATE ACCOUNTING (cont'd) (Does Not Apply to Field)	RETENTION PERIOD
Payroll Tax Returns	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Payroll W-2's and Withholding Tax Statements	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Vendor W-9's	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Unclaimed Property Transactions and Returns	7 years

FIELD ACCOUNTING (Does Not Apply to Corporate)	RETENTION PERIOD
Accounts Receivable Adjustments and Write-offs	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Balance Sheet Reconciliations	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Bank Statements and Reconciliations	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Cash Receipt Logs and Check Copies	Longer of Tax Hold or 7 years (See Above Tax Hold Note) <i>[However, for checks forwarded to a lockbox, the retention period for hard copies is 3 months]</i>
Customer Automatic Payment Authorizations	3 years after last payment
Customer Manually Billed Invoices	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Customer Refunds	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Deposit Slips and Substitute Remittance Advices	Longer of Tax Hold or 3 years (See Above Tax Hold Note)
Employee Leave Records	3 years
Expense Reports	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Fixed Asset Additions, Dispositions and Changes	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Fixed Asset Physical Inventories	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Journal Entries (Including Support Documents)	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Paid A/P Documents (Invoices, PO's and Receiving Records)	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Payroll Input Documents (Input Sheets)	Longer of Tax Hold or 3 years (See Above Tax Hold Note)

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FIELD ACCOUNTING (cont'd) (Does Not Apply to Corporate)	RETENTION PERIOD
Payroll Register** and Reports ⁽¹⁾	Longer of Tax Hold or 7 years following the latest due date for the last required filings (i.e., Forms 5500, Schedules SSA, etc.) with the IRS or Dept. of Labor with respect to employee benefit plans, or if later, 7 years following the last payment to participants or beneficiaries from the plan (See Above Tax Hold Note)
Purchase Order Logs	Longer of Tax Hold or 3 years (See Above Tax Hold Note)
Statistical Reporting Support	3 years

PERSONNEL RECORDS (Applies to Both Corporate and Field- Refer to Accounting Records for Payroll Requirements)	RETENTION PERIOD
Affirmative Action Plan	For the current and previous plan years
Affirmative Action Plan's Supporting Documentation	2 years from the date of record or personnel action involved, whichever is later
Annual Returns/Reports, Audits and Other Filings and Correspondence with the IRS and Department of Labor	Permanently
Applications and Resumes	2 years from the date of record or personnel action involved, whichever is later
Benefit/ Account Statements, Distribution Related Documents and Election Forms	Longer of Tax Hold or 7 years following the latest due date for the last required filings with the IRS or Dept. of Labor with respect to employee benefit plans, or if later, 7 years following the last payment to participants or beneficiaries from the plan (See Above Tax Hold Note)
Certificates of Age (For Employees who are Minors)	2 years from date of termination
EEO-1 Report	2 years
Employee Benefit Plans (Including Pension and Insurance Plans ⁽²⁾)	Permanently
Employee Handbooks	Permanently by Corporate Office upon being superseded
Employment Contracts and Collective Bargaining Agreements	3 years
Family & Medical Leave Act Requests and Records	3 years
Interview Notes, Tests and Test Results	2 years from the date of record or personnel action involved, whichever is later

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PERSONNEL RECORDS (cont'd) (Applies to Both Corporate and Field- Refer to Accounting Records for Payroll Requirements)	RETENTION PERIOD
Job Advertisements and Postings	2 years from the date of record or personnel action involved, whichever is later
Personnel Files of Terminated Employees	4 years after termination
Qualified Plan Testing Data and Results, Custodians' and Trustees' Reports	Longer of Tax Hold or 7 years following the latest due date for the last required filings with the IRS or Dept. of Labor with respect to employee benefit plans, or if later, 7 years following the last payment to participants or beneficiaries from the plan (See Above Tax Hold Note)
Records Relating to Hiring, Assignment, Promotion, Demotion, Transfer, Lay-Off, Termination, Rates of Pay, Selection for Training or Apprenticeship	2 years from the date of record or personnel action involved, whichever is later
Records Relating to Complaints of Discrimination, Compliance Evaluations or Enforcement Actions	Until final disposition of complaint, enforcement action or compliance evaluation
Requests for Reasonable Accommodation	2 years from the date of record or personnel action, whichever is later
Results of Physical Examinations	30 years (OSHA Requirement) from the date of record or personnel action, whichever is later
Seniority and Merit System	1 year after termination of system
Time Cards and Work Schedules (Including Additions to and Deductions from Wages and Wage Rate Tables)	2 years
I-9 Forms (To include copies of back-up documentation such as driver's license, birth certificate, etc.)	3 years from the date of hire or 1 year after termination of employment, whichever is later

MISCELLANEOUS CORPORATE RECORDS (Applies to Both Corporate and Field)	RETENTION PERIOD
Acquisitions and Divestitures (Completed Transactions – Including Accounting Workpapers and Closing Documents)	Permanently
Articles, By-laws and Minute Books	Permanently
Board of Directors and Board Committee Documents (Refers to Workpapers/ Supporting Materials for Meetings)	1 year
Bonds (Indemnity, Performance and Surety)	7 years after expiration
Capital Stock and Bond Records (Including Stock Certificates and Transfer Lists)	Permanently
Contracts and Agreements	Longer of Tax Hold or 7 years (See Above Tax Hold Note)

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FIELD ACCOUNTING (cont'd) (Does Not Apply to Corporate)	RETENTION PERIOD
Payroll Register** and Reports ⁽¹⁾	Longer of Tax Hold or 7 years following the latest due date for the last required filings (i.e., Forms 5500, Schedules SSA, etc.) with the IRS or Dept. of Labor with respect to employee benefit plans, or if later, 7 years following the last payment to participants or beneficiaries from the plan (See Above Tax Hold Note)
Purchase Order Logs	Longer of Tax Hold or 3 years (See Above Tax Hold Note)
Statistical Reporting Support	3 years

PERSONNEL RECORDS (Applies to Both Corporate and Field- Refer to Accounting Records for Payroll Requirements)	RETENTION PERIOD
Affirmative Action Plan	For the current and previous plan years
Affirmative Action Plan's Supporting Documentation	2 years from the date of record or personnel action involved, whichever is later
Annual Returns/Reports, Audits and Other Filings and Correspondence with the IRS and Department of Labor	Permanently
Applications and Resumes	2 years from the date of record or personnel action involved, whichever is later
Benefit/ Account Statements, Distribution Related Documents and Election Forms	Longer of Tax Hold or 7 years following the latest due date for the last required filings with the IRS or Dept. of Labor with respect to employee benefit plans, or if later, 7 years following the last payment to participants or beneficiaries from the plan (See Above Tax Hold Note)
Certificates of Age (For Employees who are Minors)	2 years from date of termination
EEO-1 Report	2 years
Employee Benefit Plans (Including Pension and Insurance Plans ⁽²⁾)	Permanently
Employee Handbooks	Permanently by Corporate Office upon being superseded
Employment Contracts and Collective Bargaining Agreements	3 years
Family & Medical Leave Act Requests and Records	3 years
Interview Notes, Tests and Test Results	2 years from the date of record or personnel action involved, whichever is later

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PERSONNEL RECORDS (cont'd) (Applies to Both Corporate and Field- Refer to Accounting Records for Payroll Requirements)	RETENTION PERIOD
Job Advertisements and Postings	2 years from the date of record or personnel action involved, whichever is later
Personnel Files of Terminated Employees	4 years after termination
Qualified Plan Testing Data and Results, Custodians' and Trustees' Reports	Longer of Tax Hold or 7 years following the latest due date for the last required filings with the IRS or Dept. of Labor with respect to employee benefit plans, or if later, 7 years following the last payment to participants or beneficiaries from the plan (See Above Tax Hold Note)
Records Relating to Hiring, Assignment, Promotion, Demotion, Transfer, Lay-Off, Termination, Rates of Pay, Selection for Training or Apprenticeship	2 years from the date of record or personnel action involved, whichever is later
Records Relating to Complaints of Discrimination, Compliance Evaluations or Enforcement Actions	Until final disposition of complaint, enforcement action or compliance evaluation
Requests for Reasonable Accommodation	2 years from the date of record or personnel action, whichever is later
Results of Physical Examinations	30 years (OSHA Requirement) from the date of record or personnel action, whichever is later
Seniority and Merit System	1 year after termination of system
Time Cards and Work Schedules (Including Additions to and Deductions from Wages and Wage Rate Tables)	2 years
I-9 Forms (To include copies of back-up documentation such as driver's license, birth certificate, etc.)	3 years from the date of hire or 1 year after termination of employment, whichever is later

MISCELLANEOUS CORPORATE RECORDS (Applies to Both Corporate and Field)	RETENTION PERIOD
Acquisitions and Divestitures (Completed Transactions – Including Accounting Workpapers and Closing Documents)	Permanently
Articles, By-laws and Minute Books	Permanently
Board of Directors and Board Committee Documents (Refers to Workpapers/ Supporting Materials for Meetings)	1 year
Bonds (Indemnity, Performance and Surety)	7 years after expiration
Capital Stock and Bond Records (Including Stock Certificates and Transfer Lists)	Permanently
Contracts and Agreements	Longer of Tax Hold or 7 years (See Above Tax Hold Note)

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MISCELLANEOUS CORPORATE RECORDS (cont'd) (Applies to Both Corporate and Field)	RETENTION PERIOD
Copyrights, Trademarks, Patents	Permanently
Corporate Policies	Permanently by Corporate Office upon being superseded
Dividend Records	Permanently
Franchises	Permanently
Labor Contracts	Permanently
Letters of Credit	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Letters of Intent	3 years after expiration unless transaction closes then Permanently
Litigation (Includes Subpoenas)	Permanently subject to review
Mortgages, Notes and Leases (Expired)	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Organization Charts (Retained by Corporate HR and Legal)	Longer of Tax Hold or 7 year after obsolete by Corporate Office (See Above Tax Hold Note)
Proxies	Permanently
Real Estate Contracts, Deeds, Easements, Titles	Permanently
Securities and Exchange Commission Reports	Permanently
Wire Transfers	Longer of Tax Hold or 7 years by Corporate Treasury (See Above Tax Hold Note)

SARBANES – OXLEY ACT: SECTION 404 (INTERNAL CONTROLS) SELF-TESTING DOCUMENTATION (Applies to Both Corporate and Field)	RETENTION PERIOD
SOX 404 test database, management evaluation of test results and reports to Audit Committee or Board of Directors (Corporate)	7 years
SOX 404 process definitions and testing procedures (Corporate)	3 years
SOX 404 detailed test documentation (Field and Corporate)	2 years

INSURANCE (Applies to Both Corporate and Field)	RETENTION PERIOD
Accident Reports/Claim Forms	3 years after resolved
Fire Inspection Reports	3 years
Group Disability Records	7 years
Policies (All Types, Including Expired)	Permanently
Safety Reports	3 years
DOT Accident Records	3 years

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FACILITIES, EQUIPMENT AND OPERATIONS (Applies to Both Corporate and Field)	RETENTION PERIOD
Closure Plans	Permanently
Contingency Plans	Until Superseded
Compliance Orders	Permanently
Department of Transportation Inspections	7 years
Driver Records	3 years after termination of driver
Engineering (Reports, Standards Drawings, Blueprints, Plans, Projects Completed and Projects Abandoned)	Permanently
Equipment Maintenance Records	1 year <i>(Note that records must be retained for six months after the vehicle leaves the Company's control)</i>
Facility Construction and Development Files	Permanently
Industrial Hygiene (Survey and Monitoring Results, Chemical Inventory, Material Safety Data Sheets, OSHA Citations (Internal))	Permanently
Landfill Operations (All Records, Including Scale Tickets, Manifests for Incoming Waste, Reports, Surveys, Permits, Inspections, Monitoring and Transactions)	Permanently
OSHA (300 Logs and Surveys, Inspections, Test Results, Evidence of Correction, 301 Supplementary Records of Illness or Injury, and the 300A Annual Summary)	5 years following the year in which they pertain
Plant Design and Equipment	Permanently
Underground Storage Tanks	Permanently

GOVERNMENT RECORDS AND REPORTS (Applies to Both Corporate and Field)	RETENTION PERIOD
Air, Water and Land Disposal Permits	Permanently
Licenses and Other Permits	Permanently
Reports to Environmental Regulators – Federal (EPA), State and Local Agencies	Permanently
Underlying Data and Documents for Reports to Environmental Regulators	Permanently
Governmental Documents and Forms <i>(If retention period is not indicated on form)</i>	7 years

PURCHASING AND SALES (Applies to Both Corporate and Field)	RETENTION PERIOD
Pricing Information and Reports	7 years
Purchase Orders	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Sales Contracts	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Sales Invoices	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Warranty Information	7 years

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MISCELLANEOUS CORPORATE RECORDS (cont'd) (Applies to Both Corporate and Field)	RETENTION PERIOD
Copyrights, Trademarks, Patents	Permanently
Corporate Policies	Permanently by Corporate Office upon being superseded
Dividend Records	Permanently
Franchises	Permanently
Labor Contracts	Permanently
Letters of Credit	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Letters of Intent	3 years after expiration unless transaction closes then Permanently
Litigation (Includes Subpoenas)	Permanently subject to review
Mortgages, Notes and Leases (Expired)	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Organization Charts (Retained by Corporate HR and Legal)	Longer of Tax Hold or 7 year after obsolete by Corporate Office (See Above Tax Hold Note)
Proxies	Permanently
Real Estate Contracts, Deeds, Easements, Titles	Permanently
Securities and Exchange Commission Reports	Permanently
Wire Transfers	Longer of Tax Hold or 7 years by Corporate Treasury (See Above Tax Hold Note)

SARBANES – OXLEY ACT: SECTION 404 (INTERNAL CONTROLS) SELF-TESTING DOCUMENTATION (Applies to Both Corporate and Field)	RETENTION PERIOD
SOX 404 test database, management evaluation of test results and reports to Audit Committee or Board of Directors (Corporate)	7 years
SOX 404 process definitions and testing procedures (Corporate)	3 years
SOX 404 detailed test documentation (Field and Corporate)	2 years

INSURANCE (Applies to Both Corporate and Field)	RETENTION PERIOD
Accident Reports/Claim Forms	3 years after resolved
Fire Inspection Reports	3 years
Group Disability Records	7 years
Policies (All Types, Including Expired)	Permanently
Safety Reports	3 years
DOT Accident Records	3 years

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FACILITIES, EQUIPMENT AND OPERATIONS (Applies to Both Corporate and Field)	RETENTION PERIOD
Closure Plans	Permanently
Contingency Plans	Until Superseded
Compliance Orders	Permanently
Department of Transportation Inspections	7 years
Driver Records	3 years after termination of driver
Engineering (Reports, Standards Drawings, Blueprints, Plans, Projects Completed and Projects Abandoned)	Permanently
Equipment Maintenance Records	1 year (<i>Note that records must be retained for six months after the vehicle leaves the Company's control</i>)
Facility Construction and Development Files	Permanently
Industrial Hygiene (Survey and Monitoring Results, Chemical Inventory, Material Safety Data Sheets, OSHA Citations (Internal))	Permanently
Landfill Operations (All Records, Including Scale Tickets, Manifests for Incoming Waste, Reports, Surveys, Permits, Inspections, Monitoring and Transactions)	Permanently
OSHA (300 Logs and Surveys, Inspections, Test Results, Evidence of Correction, 301 Supplementary Records of Illness or Injury, and the 300A Annual Summary)	5 years following the year in which they pertain
Plant Design and Equipment	Permanently
Underground Storage Tanks	Permanently

GOVERNMENT RECORDS AND REPORTS (Applies to Both Corporate and Field)	RETENTION PERIOD
Air, Water and Land Disposal Permits	Permanently
Licenses and Other Permits	Permanently
Reports to Environmental Regulators – Federal (EPA), State and Local Agencies	Permanently
Underlying Data and Documents for Reports to Environmental Regulators	Permanently
Governmental Documents and Forms (<i>If retention period is not indicated on form</i>)	7 years

PURCHASING AND SALES (Applies to Both Corporate and Field)	RETENTION PERIOD
Pricing Information and Reports	7 years
Purchase Orders	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Sales Contracts	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Sales Invoices	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Warranty Information	7 years

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TRAFFIC (RECEIVING AND SHIPPING) (Applies to Field)	RETENTION PERIOD
Bills of Lading and Freight Bills	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Hazardous Waste Manifests	Permanently
Manifests (For Wastes Generated and Wastes Transported by the Company)	7 years
Shipping and Receiving Reports	7 years
Dispatch Sheets	1 year
Route Sheets	1 year
Scale Tickets	Permanently

TAX RECORDS (Applies to Both Corporate and Field)	RETENTION PERIOD
Income/Franchise Tax Returns	Permanent
Tax Workpaper Packages (Originals)/Other (Correspondence, Acquisition/Divestiture Schedules, etc.)	Refer to Tax Records Notes Below
Sales and Use Tax	Refer to Tax Records Notes Below
Property Tax	Refer to Tax Records Notes Below
Excise Tax	Refer to Tax Records Notes Below

NOTES RELATED TO TAX RECORDS RETENTION PERIODS:

- Tax records retained will consist of only those records that directly support the amounts and other information reflected in the various tax returns. (Exception: Upon notification of litigation or an official investigation (including an audit by a governmental authority), all related existing or subsequently created tax records will be retained.)

- Retention Period for Tax Records: A tax record will be retained until the date of the statute of limitations expires with respect to the tax return that the tax record supports. (Exception: In the case of litigation or an official investigation (including an audit by a governmental authority), all related tax records will be retained permanently until otherwise notified in writing by the Corporate Legal Department or the Vice President, Tax.)

- Refer to the "Reportable Transaction Retention Guidelines" as posted under Tax on *Inside Allied*.

CORRESPONDENCE (Applies to Both Corporate and Field)	RETENTION PERIOD
General	Same retention period as subject matter or record it supports
Legal	Same retention period as subject matter or record it supports
Tax	Same retention period as subject matter or record it supports
E-Mails ⁽³⁾	Trash Mail Folder: Automatic 7 day purge All Other Folders: Automatic nightly purge excluding those messages received within the past 90 days of such date

This policy is applicable to all corporate, regional, district and divisional employees, and each employee is required to abide by the provisions set forth therein. The information in this manual is the property of Allied Waste Industries, Inc. and is to be used only in connection with the conduct of the business of Allied and/or its subsidiaries (being collectively referred to in the policies as the "Company" or "Allied"). This policy is not intended to and does not constitute or create contractual terms of employment.

GENERAL NOTES:

- (1) Records include full name, identification number, home address, date of birth, gender, occupation, day and time work week begins, hours worked each day and week, total daily or weekly earnings, overtime compensation, basis of overtime computation, total wages for each pay period, payment date and pay period.
- (2) Includes profit sharing, ESOP, money purchase pension, 401(k) target benefit, cash balance or deferred benefit retirement plans.
- (3) Electronic messages, whether sent or received, have the same legal status as hard-copy documents and their retention is governed by established records management guidelines. The individuals authoring or receiving electronic messages are responsible for ensuring compliance with appropriate retention requirements. E-mail is intended for informal correspondence and communications and must not be used for official record-keeping purposes. Any E-mail records deemed to have administrative, legal, tax or fiscal retention requirements must be printed out and saved as a paper document or saved as an electronic document to either a hard drive or removal data storage (i.e., diskette). All other electronic messages are to be deleted as soon as they have served their purpose. The Company provides a limited back-up period of its e-mail system for the sole purpose of a disaster recovery. Users should not depend on this in case of a system failure. E-mail is not the mechanism to be used for the long-term retention of records.

ADDITIONAL COMPLIANCE REFERENCES:

- **Policy and Control Manual: Policy No.: G-111, "Electronic Mail, Internet Access and Use of the Worldwide Web"**
- **Reportable Transaction Retention Guidelines**
- **Alcohol and Drug Free Workplace and Substance Abuse Procedures**

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TRAFFIC (RECEIVING AND SHIPPING) (Applies to Field)	RETENTION PERIOD
Bills of Lading and Freight Bills	Longer of Tax Hold or 7 years (See Above Tax Hold Note)
Hazardous Waste Manifests	Permanently
Manifests (For Wastes Generated and Wastes Transported by the Company)	7 years
Shipping and Receiving Reports	7 years
Dispatch Sheets	1 year
Route Sheets	1 year
Scale Tickets	Permanently

TAX RECORDS (Applies to Both Corporate and Field)	RETENTION PERIOD
Income/Franchise Tax Returns	Permanent
Tax Workpaper Packages (Originals)/Other (Correspondence, Acquisition/Divestiture Schedules, etc.)	Refer to Tax Records Notes Below
Sales and Use Tax	Refer to Tax Records Notes Below
Property Tax	Refer to Tax Records Notes Below
Excise Tax	Refer to Tax Records Notes Below

NOTES RELATED TO TAX RECORDS RETENTION PERIODS:

- Tax records retained will consist of only those records that directly support the amounts and other information reflected in the various tax returns. (Exception: Upon notification of litigation or an official investigation (including an audit by a governmental authority), all related existing or subsequently created tax records will be retained.)

- Retention Period for Tax Records: A tax record will be retained until the date of the statute of limitations expires with respect to the tax return that the tax record supports. (Exception: In the case of litigation or an official investigation (including an audit by a governmental authority), all related tax records will be retained permanently until otherwise notified in writing by the Corporate Legal Department or the Vice President, Tax.)

- Refer to the "Reportable Transaction Retention Guidelines" as posted under Tax on *Inside Allied*.

CORRESPONDENCE (Applies to Both Corporate and Field)	RETENTION PERIOD
General	Same retention period as subject matter or record it supports
Legal	Same retention period as subject matter or record it supports
Tax	Same retention period as subject matter or record it supports
E-Mails ⁽³⁾	Trash Mail Folder: Automatic 7 day purge All Other Folders: Automatic nightly purge excluding those messages received within the past 90 days of such date

This policy is applicable to all corporate, regional, district and divisional employees, and each employee is required to abide by the provisions set forth therein. The information in this manual is the property of Allied Waste Industries, Inc. and is to be used only in connection with the conduct of the business of Allied and/or its subsidiaries (being collectively referred to in the policies as the "Company" or "Allied"). This policy is not intended to and does not constitute or create contractual terms of employment.

GENERAL NOTES:

- (1) Records include full name, identification number, home address, date of birth, gender, occupation, day and time work week begins, hours worked each day and week, total daily or weekly earnings, overtime compensation, basis of overtime computation, total wages for each pay period, payment date and pay period.
- (2) Includes profit sharing, ESOP, money purchase pension, 401(k) target benefit, cash balance or deferred benefit retirement plans.
- (3) Electronic messages, whether sent or received, have the same legal status as hard-copy documents and their retention is governed by established records management guidelines. The individuals authoring or receiving electronic messages are responsible for ensuring compliance with appropriate retention requirements. E-mail is intended for informal correspondence and communications and must not be used for official record-keeping purposes. Any E-mail records deemed to have administrative, legal, tax or fiscal retention requirements must be printed out and saved as a paper document or saved as an electronic document to either a hard drive or removal data storage (i.e., diskette). All other electronic messages are to be deleted as soon as they have served their purpose. The Company provides a limited back-up period of its e-mail system for the sole purpose of a disaster recovery. Users should not depend on this in case of a system failure. E-mail is not the mechanism to be used for the long-term retention of records.

ADDITIONAL COMPLIANCE REFERENCES:

- **Policy and Control Manual: Policy No.: G-111, "Electronic Mail, Internet Access and Use of the Worldwide Web"**
- **Reportable Transaction Retention Guidelines**
- **Alcohol and Drug Free Workplace and Substance Abuse Procedures**

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Policy No.: LGL-111
Initial Release Date: 05/05/2011
Revision Date: N/A

Policies and Procedures Manual ("PPM")

Records Management

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Note: The information in this Manual is the property of Republic Services, Inc. ("Republic") and is to be used in connection with the conduct of the business of Republic and/or its subsidiaries (being collectively referred to in the policies as the "Company" or "Republic"). These policies are not intended to and do not constitute or create contractual terms of employment.



Policy No.: LGL-111
Initial Release Date: 05/05/2011
Revision Date: N/A

1. Purpose

The purpose of this section of the Policies and Procedures Manual ("PPM") is to describe Republic Services, Inc.'s and its subsidiaries ("Republic" or the "Company") policies and procedures concerning the proper retention and management of Company records.

2. Applicability

This policy is applicable to all employees and consultants.

3. Policy Effective Date

This policy is effective as of May 5, 2011.

Company policies are modified or updated from time to time. Employees and consultants therefore should always refer to the Company's Corporate website for the most current version of the policy.

4. Policy Contact(s)

Questions concerning this policy should be directed to:

Eileen Schuler
Manager, Corporate Governance and Compliance
(480) 627-7154
eschuler@republicservices.com

5. General Policy

To operate effectively, the Company must retain necessary records and dispose of unnecessary records in a systematic manner. Republic's policy is to (i) retain all records only as long as needed to satisfy operational, financial, legal and audit requirements; (ii) timely dispose of records which have exceeded all applicable retention periods; and (iii) ensure corporate recovery and survival in the event of a disaster.

"Company Records" or "Records" are all data and documents that are created, received, or maintained as part of the Company's business activities. Company Records may be stored on any electronic or non-electronic media (such as paper, video or audio tape, microfilm or microfiche, or hard drive, disk, server or other electronic storage device) or in any format (such as memos, spreadsheets, E-mail, or engineering drawings). Company Records should not be maintained on personal or home computers.

The Internal Revenue Service, Securities and Exchange Commission ("SEC"), and other government regulatory agencies and auditors have established guidelines for maintaining various records. To ensure that the Company complies with these requirements, the general retention periods are set forth in the schedule that accompanies this policy. The retention period refers to the number of years that Company Records need to be maintained after becoming inactive or after other events specified in the attached schedule.

By retaining only necessary records, the Company will eliminate the expenditure of human, physical and financial resources in the maintenance and retrieval of useless information and will be able to maintain and retrieve useful information more effectively.



6. Employee Responsibilities

A. Employees

- 1) Employees are required to comply with this policy and the record retention periods as set forth in the schedule that accompanies this policy. Each employee is responsible for regularly reviewing Records under his or her control to make sure that unnecessary Records are not being created or retained.

B. Management

- 1) Each responsible Corporate Department Head, Senior Vice President – Regional Operations, Area President and General Manager is responsible for implementing and complying with this policy within his or her organization.

7. General Procedures and Controls

A. Suspension or Holds on Normal Disposal of Records

- 1) Records are expected to be retained for the period of time specified and no longer. The only exception to these retention periods is if the Legal Department or outside counsel have notified the Records' custodian that the Records must be maintained in connection with litigation or an investigation (a "Legal Hold"). In that instance, the Records may not be destroyed until the Legal Department lifts the Legal Hold in writing.
- 2) Due to document retention requirements associated with the Company's tax filings, certain Records that originated from legacy Allied Waste locations will continue to be retained pursuant to tax holds as noted in the schedule that accompanies this policy. These tax holds only apply to the noted Allied Waste Records prepared on or after January 1, 2000. These Allied Waste Records must be retained beyond the otherwise applicable retention period until the custodian is notified in writing by the Corporate Tax Department that the Records are no longer subject to a tax hold. All Records prepared or created prior to these dates may be destroyed in accordance with the otherwise applicable retention periods. Employees should contact the Vice President, Tax at (480) 627-2216 if they have questions regarding this requirement.

B. Implementation

- 1) In implementing this policy unless otherwise notified, no formal, written procedure is required, provided that a uniform and consistent practice, guided by the following principles, is adopted and communicated to employees by Company management as referred to in Section 6.B.
 - a). Retain and dispose of Records systematically, uniformly and consistently according to the readily identifiable reasonable business needs and legal requirements applicable to the Company location.
 - b). Comply with the record retention periods as set forth in the schedule that accompanies this policy.
 - c). Hold all Company Records, including all customer information and employee records, in confidence and treat them as Company assets. Records must be safeguarded and may be disclosed to parties outside the Company only upon proper authorization by the Company or pursuant to a court order or subpoena or other applicable law. Any subpoena received by employees or

questions regarding the release of Company Records must be directed to the Legal Department prior to the release of such records.

- d). Comply with all directives from the Legal Department to refrain from disposing of Records subject to a Legal Hold.
- e). Suspend the normal disposal of Records pursuant to this policy whenever any government agency either commences an investigation or action. In such case, immediately retain all Records relating to the subject matter of the government investigation or action. Immediately contact the Legal Department to alert counsel of such investigation or action unless the Legal Department has already provided notification regarding such matter.
- f). Ensure that all electronic messages ("E-mail") are retained pursuant to the appropriate retention requirements. E-mail is intended for informational correspondence and communications and should not be used for long-term record-keeping purposes. E-mails should be deleted after the business purpose and/or intent of the message has been satisfied in order to reduce individual mailbox size capacity. Any E-mail records deemed to have administrative, legal, tax or fiscal retention requirements must be printed out and saved as a paper document or saved as an electronic document on the Company's servers or share drives. The Company provides an automatic archive of its E-mail system for a three-year period, in addition to a mailbox purge process managed by the IT Department. (Also refer to the Corporate Information Technology policy.)
- g). Upon termination of employment, Company Records must be returned to the former employee's supervisor.

8. Record Retention Periods Schedule

The record retention periods for particular categories of Records are included in the following schedule. The retention period refers to the number of years a Record needs to be maintained after it becomes inactive. Paper or hard copies of Records must be retained for the specified retention period unless this policy is revised to require such Records to be stored in electronic format as noted with an asterisks (*). Electronic retained Records are those generated from applications as part of the Corporate IT Systems and have an automatic back-up program (e.g., InfoPro, Lawson, ePRO, etc.).

Scanned Records

The Company utilizes an electronic storage program to scan and code certain categories of Company Records in order to, among other things: (i) make those records easier to find; (ii) make those records more secure; (iii) reduce record duplication, thereby increasing efficiency; and (iv) reduce paper record storage costs. In most cases, *but with important exceptions*, the Company considers a scanned record to be a duplicate of the original paper record, such that the original paper record may be destroyed. Examples of paper records that must not be destroyed even if scanned include:

- Non-Standard Customer Contracts (including Franchise/Municipal Agreements);
- Employee Form I-9s; and
- Driver Qualification Files.

In furtherance of this policy, please consult with the Legal Department *before* destroying any paper record on the basis that its scanned image constitutes a duplicate record.



Policy No.: LGL-111

Initial Release Date: 05/05/2011

Revision Date: N/A

Schedule of Retention Periods

ACCOUNTING – ACCOUNTS PAYABLE	RETENTION PERIOD (IF "LONGER OF TAX HOLD" IS NOTED, REFER TO SECTION 7 FOR TAX HOLDS INVOLVING LEGACY ALLIED WASTE LOCATIONS)	APPLICABLE TO CORPORATE AND/OR FIELD
1099 Forms (*) and Filings	Current Plus 7 Years	Corporate (legacy Allied up to 2009), Field (legacy Republic), Outsourced Post Merger (2009 and current)
AP 136 and GL 290 to Reconcile	Current Plus 7 Years	Corporate and Field
AP 190 – Invoice Reinstatement	Current Plus Prior Year	Corporate and Field
AP 220 Batch Report – Signed	Current Plus Prior Year	Corporate and Field
AP Control Log – Signed	Current Plus Prior Year	Corporate and Field
AP Invoices with Receiving Documents - Signed	Current Plus 7 Years	Corporate and Field
[For transportation vendors receiving documents may include scale tickets.]		
AP Month-End Closing Documents (*)	Current Plus Prior Year	Corporate and Field
AP Payment History (*)	Current Plus 7 Years	Corporate and Field
AP Trial Balance / Aged Trial Balance (*)	Current Plus 7 Years	Corporate
Checks (Voided)	Destroy Immediately	Corporate and Field
Disposal Tickets for Republic Using External Sites	3 years	Corporate
ERMI and/or American Ref-Fuel Invoices	Indefinitely	Corporate
Escheat Files>Returns-Paper Documents	Indefinitely	Corporate
Expense Reports (*)	Longer of Tax Hold or 7 Years	Corporate and Field
Purchase Orders (Manual)	Current Plus Prior Year	Field
Purchase Order Logs (Electronic)	Current Plus Prior Year	Field
W-9 Forms	Greater of 7 years or the Term during which Vendor Utilized	Field
ACCOUNTING – ACCOUNTS RECEIVABLE (ROBOT Reports, InfoPro, TRUX, RSI, and PC Scale)	RETENTION PERIOD (IF "LONGER OF TAX HOLD" IS NOTED, REFER TO SECTION 7 FOR TAX HOLDS INVOLVING LEGACY ALLIED WASTE LOCATIONS)	APPLICABLE TO CORPORATE AND/OR FIELD
AR Aged Trial Balance Summary (*)	Current Plus 7 Years	Corporate and Field
AR Aged Trial Balance Totals (*)	Current Plus 7 Years	Corporate and Field
Automatic Billing Authorization Form	Term of Agreement Plus 2 Years	Corporate and Field
Bankruptcy Documents	2 Years after Conclusion of Matter	Corporate and Field
Collection / Stop Service Policy	Current Plus Prior Version	Field
Control Report from Billing Outsourcer (verification report signed by billing clerk)	Current Plus Prior Year	Field
Credit/Debit Adjustments	Current Plus 7 Years	Corporate and Field
Credit Reports for New Customers	Term of Contract Plus 3 Years	Field
Customer Complaint Files (*)	Current Plus 7 Years	Field
Customer File, Including Credit Application and Supporting Documentation	Term of Contract Plus 3 Years	Field
Customer Purchase Orders	Term of Contract Plus 3 Years	Field
Customer Reports (New) (RP 1403, 1404 and 1407)	Current Plus Prior Year	Field
Customer Service Records/Agreements (*)	Longer of Tax Hold or Term of Contract Plus 7 Years	Field
Daily Ticket Reconciliations	Current Plus Prior Year	Field
Day End Sales and Adjustment Batches by User ID	Current Plus Prior Year	Field
EFT Enrollment Forms	Term of Agreement Plus 2 Years	Corporate and Field
Franchise Agreements	Longer of Tax Hold or Term of Contract Plus 7 Years	Field



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ACCOUNTING – ACCOUNTS RECEIVABLE (continued) (ROBOT Reports, InfoPro, TRUX, RSI, and PC Scale)	RETENTION PERIOD (IF "LONGER OF TAX HOLD" IS NOTED, REFER TO SECTION 7 FOR TAX HOLDS INVOLVING LEGACY ALLIED WASTE LOCATIONS)	APPLICABLE TO CORPORATE AND/OR FIELD
Image Lockbox Output List (TRUX)	Current Plus 7 Years	Corporate and Field
Monthly Approved List of Accounts Not to Lock - Signed	Current Plus Prior Year	Field
Monthly Automated Sales Report (ASR) – Signed	Current Plus Prior Year	Field
Monthly Operating Work Order Report	Current Plus Prior Year	Field
Municipal Contracts	Longer of Tax Hold or Term of Contract Plus 7 Years	Field
PC Scale Day End Report	Current Plus Prior Year	Field
Price Matrices	Current Plus Prior Version	Field
Rate Sheets for Gate Customers	Current Plus Prior Version	Field
RSI Batch Reports (for batch posting) (*)	Current Plus Prior Year	Corporate and Field
RSI Month End Report for Current Month – Signed (*)	Current Plus Prior 7 Years	Field
Sales & Adjustment Report for Current Month - Signed	Current Plus Prior Year	Field
Sales Report Current/Deferred by GL Code	Current Plus Prior 7 Years	Field
Scalehouse Exception Ticket Reports (*) and Signed Logs - Manually Entered Tickets with Weights (manual tickets) - Void Ticket List (voided tickets) - Logged Activities Report (deleted tickets) - RDT – Reprint Disposal Tickets (reprinted/duplicate tickets)	Current Plus Prior 2 Years	Field
ACCOUNTING – ASSET MANAGEMENT	RETENTION PERIOD (IF "LONGER OF TAX HOLD" IS NOTED, REFER TO SECTION 7 FOR TAX HOLDS INVOLVING LEGACY ALLIED WASTE LOCATIONS)	APPLICABLE TO CORPORATE AND/OR FIELD
Annual Fixed Asset Physical Count Reports and Reconciliations (*)	Longer of Tax Hold or Current Plus Prior Year	Corporate and Field
Approved Capital Addition Forms and Supporting Documentation	Longer of Tax Hold or Life of Asset through Date of Disposal Plus 1 Year	Corporate and Field
Approved Capital Expenditures (CEs) and Supporting Documentation (*)	Longer of Tax Hold or Current Plus Prior Year	Corporate and Field
Approved Capital Retirement Forms and Supporting Documentation	Longer of Tax Hold or Current Plus Prior Year	Corporate
Approved Capital Transfer Forms	Longer of Tax Hold or 3 Years	Corporate and Field
Asset Management (Am 260) Monthly Close Reports	Longer of Tax Hold or Current Plus 7 Years	Corporate
Asset Reconciliation (RS270) – Signed Off	Longer of Tax Hold or 7 Years	Field
ACCOUNTING – REAL PROPERTY TAX	RETENTION PERIOD (IF "LONGER OF TAX HOLD" IS NOTED, REFER TO SECTION 7 FOR TAX HOLDS INVOLVING LEGACY ALLIED WASTE LOCATIONS)	APPLICABLE TO CORPORATE AND/OR FIELD
Personal Property Tax Returns and Supporting Schedules	Longer of Tax Hold or Current Plus 7 Years	Corporate
ACCOUNTING – CASH	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Cancelled Checks (*)	Current Plus 7 Years	Corporate and Field
Cash Balance Sheet Reconciliation Folder (*): - Bank Reconciliation - Bank Statements - Copies of Deposit Tickets - Daily Cash Receipts Summary InfoPro - List of Outstanding Checks - Month End Cash Receipts Journal InfoPro - Support for Unusual Reconciling Items	Current Plus 7 Years	Field
Cash Receipts Log	Current Plus 7 Years	Field
Petty Cash Surprise Counts	Current Plus Prior Year	Field



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ACCOUNTING – CONTROLLER'S GROUP (OPERATIONS)	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Account Analysis Folder (or other documentation supporting account balances) (*): - Supporting Schedules - Periodic Reconciliations of Schedules to Accounts being Analyzed - Supporting Documentation such as Agreements, Contracts, Copies of Invoices and Checks and Correspondence	Current Plus 7 Years	Corporate and Field
Monthly Operating Reports (MOR) (*)	Current Plus 7 Years	Corporate
Monthly MOR Books and Review	3 Months	Corporate
MOR Notes Database (*)	Current Plus 7 Years	Corporate
ROI Model Approved by AP and AC (*)	Current Version	Corporate
ACCOUNTING – GENERAL AND BUDGET PLANNING	RETENTION PERIOD (IF "LONGER OF TAX HOLD" IS NOTED, REFER TO SECTION 7 FOR TAX HOLDS INVOLVING LEGACY ALLIED WASTE LOCATIONS)	APPLICABLE TO CORPORATE AND/OR FIELD
Acquisition and Divestiture Accounting Workpapers/Files	Longer of Tax Hold or Current Plus 7 Years	Corporate
Bom Ambiente Accounting Binders	Indefinitely	Corporate
Budget Files Used to Create Annual Operating Budgets (*)	Until June 30 th of the Following Budget Year	Corporate)
Budget Reconciliation Files (*)	Current Plus Prior Year	Corporate
Close Month-End Report	7 Years	Corporate
Month-End Close and Statistics Files (*)		
General Ledger (*)	Longer of Tax Hold or 7 Years	Corporate
Lawson Accounting Reports (e.g., Financial Statements, Statistical Reports, Productivity Reports) (*)	Longer of Tax Hold or 7 Years	Corporate
Lawson Configuration Security Requests for New Company (email) (*)	3 Years	Corporate
Lawson Daily Exception Report- Signed Off (*)	Current Plus Prior Year	Corporate
Lawson/Essbase Balancing Report –Signed Off (*)	Current Plus Prior Year	Corporate
Level 3 P&L (*)	Longer of Tax Hold or 7 Years	Corporate
Monthly or Quarterly Physical Inventory Count (Parts and Fuel Inventory)	Current Plus Prior Year	Field
Normal and Intercompany Journal Entries and Supporting Documentation (*)	Longer of Tax Hold or Current Plus 7 Years	Corporate
Sales Journal by Cycle and Supporting Documentation for Revenue Journal Entries (*)	Longer of Tax Hold or Current Plus 7 Years	Corporate
ACCOUNTING – FINANCIAL/EXTERNAL REPORTING	RETENTION PERIOD (IF "LONGER OF TAX HOLD" IS NOTED, REFER TO SECTION 7 FOR TAX HOLDS INVOLVING LEGACY ALLIED WASTE LOCATIONS)	APPLICABLE TO CORPORATE AND/OR FIELD
Environmental Models and Binders (*)	Longer of Tax Hold or Current Plus 7 Years	Corporate
External Audit Reports or Financial Statement Reviews	Current Plus 7 Years	Corporate and Field
Financial (Ad Hoc) Analysis (Final Versions) (*)	5 Years (Drafts Destroyed after Finalized)	Corporate and Field
Financial Forecasts, Projections and Similar (Final Versions) (*)	5 Years (Drafts Destroyed after Finalized)	Corporate and Field
Landfill Accounting Model (*)	Longer of Tax Hold or Current Plus 7 Years	Corporate
Landfill Quarterly Update Form (*)	5 Years	Corporate and Field
Monthly/Quarterly Essbase Reports (*)	Current Plus 7 Years	Corporate
SEC Filing Binders to include original signature pages for the various filings (coordinate with Legal Department): Forms: 10-Q, 10-K, 8-K, 11-K (401-k), etc. Proxy Statements (including final proxy voting results). Registration Statements: S-3, S-8, etc. 302/906 Certifications (includes correspondence and comment letters)	Indefinitely (Final Filings) Current Plus 7 Years (Workpapers/Binders Supporting Transaction/Filing)	Corporate
SFAS 123(R) Binders	Current Plus 7 Years	Corporate
SFAS 143 Binders (*)	Current Plus 7 Years	Corporate and Field
SFAS 123(R) and 143 Calculations/ Databases/Models (*)	Current Plus 7 Years	Corporate
Quarterly Calculation of Interest Rate Exchange Activity Including Confirmations from Counter-Parties	Greater of 7 Years or Term of Exchange	Corporate
Quarterly External Financial Reporting Binders and Schedules	Current Plus 7 Years	Corporate
Quarterly Representation Letters	5 Years	Corporate and Field



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ACCOUNTING – TAXES	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Administrative Files and Correspondence (*)	Indefinitely	Corporate
Annual Business License Reports	Current Plus 7 Years	Corporate and Field
Audit Files – Federal, State and Other Tax Examinations	Until Expiration of Statute of Limitations	Corporate
City Business Licenses	Current Plus 7 Years	Corporate and Field
Executive Personal Use of Company Aircraft (includes monthly information and flight logs)	Until Expiration of Statute of Limitations	Corporate
Federal and State Income / Franchise Tax Compliance Workpapers	Indefinitely	Corporate
Form 2290 Returns (*)	Until Expiration of Statute of Limitations	Corporate and Field
IFTA Tax Forms (*)	Until Expiration of Statute of Limitations	Corporate and Field
Income and Franchise Tax Returns (*)	Indefinitely	Corporate
Permanent Tax Files: Mergers and Acquisitions, Elections (8023)/Methods (3115) and Closing Agreements	Indefinitely	Corporate
Project Files (*): - Provision, Payments/Forecasts, FIN 48 Analysis, Miscellaneous - Tax Planning	Indefinitely	Corporate
Sales and Use Tax Returns (includes Supporting Documents)	Until Expiration of Statute of Limitations	Corporate and Field
ENGINEERING	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
All Environmental Permits (solid waste, air, landfill, stormwater, NPDES, wetland impact, etc.)- Includes Applications and Submittals	Indefinitely	Field
Capital Plans (Five Years) (*)	7 Years	Corporate (Models retained on Database- FIS or Citrix Server); Field (Supporting Documents)
Corporate Compliance Database (*)	Indefinitely	Corporate (Retain Current Formats)
Daily PC Scales Report Package (*)	7 Years	Field
Design Drawings, Construction Certifications and/or Closure Reports for any Infrastructure Constructed at Facility (buildings, scales, pipelines, etc.)	Indefinitely	Field
Environmental Monitoring Data	Indefinitely	Field
Financial Assurance Request Forms and Calculations	Indefinitely	Field
Inspection Results	Indefinitely	Field
Landfill Quarter End Reports	Current Plus Prior Year	Field
Lawson Essbase Landfill Tons Report (*)	7 Years	Field
Lawson Essbase Transfer Station Report (*)	7 Years	Field
Monthly Early Register Close Out – Signed Off	Currently Plus Prior Year	Field
Monthly Fuel System Reading or Stick Reading	Past 12 Months	Field
Monthly Gate Check Summaries – Signed Off	Current Plus Prior Year	Field
Monthly PC Scales Report Package (*)	7 Years	Field
Notices of Violations (NOVs)	Indefinitely	Copies of NOVs should be sent to Corporate for inclusion in Compliance Database and Field should retain in facility operating record per permit or state regulatory requirements
Other Waste Manifests	Indefinitely	Field
Periodic Waste Tonnage Reports (*)	7 Years	Field
Regulatory Submittals and Correspondence	Indefinitely	Field
Scale Tickets (Company Landfills/Transfer Stations)	Current Plus Prior 3 Years or Indefinitely until advised by Legal if Site is Superfund or subject to investigation for remediation costs (whether under Superfund or some other law or order)	Field
Site File (profile, permits, site development, expansion and operating record)	Indefinitely	Field



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ENGINEERING (continued)	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Special Waste Manifests	Indefinitely	Field
UOC Rate Files	Current Plus Prior Year	Field (Detailed Backup) Corporate (* Model)
Reports to Environmental Regulators (Federal,(EPA), State and Local Agencies) (includes underlying data and documents for reports)	Indefinitely	Field
Underground/Above Ground Storage Tank permits, permit applications and monitoring information	Indefinitely	Field
Any Other Governmental Documents and Forms (if retention period is not indicated herein)	Indefinitely	Field
HUMAN RESOURCES	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Affirmative Action Plan and Supporting Documentation	Current Plus 2 Years	Corporate
Charges or Investigations Involving Administrative Agencies (e.g., DOL, EEOC, NLRB, OSHA, etc.) and Any Type of Employment Lawsuits Resulting from such Charges or Investigations	Until Final Disposition of the Matter Plus 2 Years	Corporate
Collective Bargaining Agreements	Indefinitely	Corporate
Internal Complaints Regarding an Employee's Employment (e.g., Discrimination, Harassment and/or Retaliation), including investigation data and all other related documents)	Term of Employment Plus 6 Years	Corporate and Field
Employee Benefit/Account Statements, Distribution Related Documents and Election Forms (*)	Indefinitely	Corporate
Employee Benefit Plans (including pension plans, insurance plans and group disability records) (*)	Indefinitely	Corporate
Employee Benefit Elections and Beneficiary Forms (*)	Term of Employment Plus 3 Years	Corporate
Employment Contracts	Term of Employment/Contract Plus 10 Years	Corporate
Employee Handbooks	As Long as in Effect, Plus 6 Years	Corporate (Company-wide) and Field (Local)
Equal Employment Opportunity (EEO) Reports	3 Years	Corporate
Family and Medical Leave Act Requests and Records	3 Years	Corporate and Field
Other Leaves Records: Military Leaves of Absence	3 Years	Corporate and Field
Grants of Equity-Based Compensation (*)	Term of Employment Plus 10 Years	Corporate
Immigration (I-9) Forms (Separate into Two Binders: Active and Terminated) (All I-9 Forms and Supporting Documentation must be maintained in a separate secured file and not part of any other employee record or file.)	Company to Purge I-9 and Attached Documentation for Any Terminated Employee 3 Years After Date of Hire or 1 Year After Date of Termination, Whichever Comes Later	Corporate and Field
Hiring Records/ Selection of Applicants: <ul style="list-style-type: none"> Job Advertisements and Postings Job Descriptions Applicant Tracking Log Interview Notes, Tests and Test Results (Refer to Individual Personnel File for Hiring Records associated with an Employee)	2 Years from the date of record or personnel action involved, whichever is later	Corporate and Field
Individual Personnel File: <ul style="list-style-type: none"> Annual and Long-Term Compensation Certificate of Age Disciplinary Notices and Documents Employment Application Letters of Recognition New Hire/Orientation Training (Safety Training) Non-Compete/Confidentiality Agreement Performance Evaluations Personnel Action Forms Records Relating to Hiring, Assignment, Promotion, Demotion, Transfer, Layoff, Rates of Pay and Other Forms of Compensation, Offer Letter, W-4, PAF, etc. Resume Signed Policy Acknowledgments (e.g., Introductory Employment Period, Drug & Alcohol Policy, Employee Handbook, Compliance Certificate, etc. as applicable) Relocation Repayment Agreements (continued on next page)	Term of Employment Plus 6 Years	Corporate and Field



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HUMAN RESOURCES (continued)	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Individual Personnel File (continued): <ul style="list-style-type: none"> Severance Agreements Termination Records Training Records, Scores and Certifications (if not electronically recorded in the Republic Learning Portal) User Roles and Profile Request Forms (e.g., RSI, Lawson, Kronos, Route Smart, PC Scale, Network, etc.) Veteran Status Records 	Term of Employment Plus 6 Years	Corporate and Field
Organizational Charts	As Long as in Effect Plus 6 Years	Corporate
Physical Examinations Results	Term of Employment Plus 3 Years	Corporate and Field
Qualified Plan Testing Data (including results, custodian's and trustee's reports, annual reports, returns, audits, other filings and correspondence with IRS and DOL)	Indefinitely	Corporate
Reasonable Accommodations Requests	Until 3 Years after Employee Leaves the Company	Corporate and Field
Seniority and Merit Systems	As Long as in Effect, Plus 5 Years	Field
Training Records, Scores and Certifications (*)	Term of Employment Plus 6 Years	Corporate
INTERNAL AUDIT AND SOX	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Audit Workpapers and Reports (*)	7 Years	Corporate
Special Projects (workpapers, reports and supporting documentation) (*)	As Determined by Legal Department or Project Owner	Corporate
Sarbanes-Oxley Act (SOX) (*): <ul style="list-style-type: none"> Corporate Controls Testing Deficiency Analysis Entity-Level Controls Testing IT General and Application Control Matrices and Testing Workpapers Peer Review Testing Remediation Testing SAS 70/SSAE 16 Annual Risk Assessment SOX Narrative Documentation (includes narratives, summaries and flowcharts) 	Current Plus 7 Years (Workpapers/Binders Supporting Transaction/Filing)	Corporate
IT (INFORMATION TECHNOLOGY)	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Accounts Created and Deleted Events (*)	Current Plus Prior Year	Corporate
Annual DR Test Results (*)	Current Plus Prior Year	Corporate
Application System Security Matrices (*)	Until Superseded	Corporate
Audit Log Cleared Events (*)	Current Plus Prior Year	Corporate
Change Management Authorization Forms (*)	3 Years	Corporate
Change Management System Upgrades Test Results (*)	3 Years	Corporate
Contractor Terms of Use Agreement and Remote Access Authorization Form	Current Plus Prior Year	Corporate and Field
Corporate Termination Weekly Report (*)	Current Plus Prior Year	Corporate
Email Retention (*)	3 Years	Corporate
IBM Service Tech Activity Log (*)	Current Plus Prior Year	Corporate
InfoPro Programming Log (Command Line Use Review) (*)	Current Plus Prior Year	Corporate
InfoPro User Access Reviews (*)	Current Plus Prior Year	Corporate
iSeries Anti-Virus Report (*)	Current Plus Prior Year	Corporate
iSeries Audit Setup (*)	Current Plus Prior Year	Corporate
iSeries System Breach Report (*)	Current Plus Prior Year	Corporate
Installation Events (*)	3 Years	Corporate
IT Operations and Help Desk Monthly Statistics (*)	Current Plus Prior Year	Corporate



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IT (INFORMATION TECHNOLOGY) (continued)	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Help Desk Weekly Activity Report (*)	Current Plus Prior Year	Corporate
Lawson Programming Log (Command Line Use Review) (*)	Current Plus Prior Year	Corporate
License Agreements for Software	Term of Agreement Plus 3 Years	Corporate
Monitor iSeries SYS* User Profiles (*)	Current Plus Prior Year	Corporate
New User Request Form (NURF) (*)	Current Plus Prior Year	Corporate
Off-Site Backup Tapes Monthly Report Review (*)	Current Plus Prior Year	Corporate
Review Data Center Guest Log/Review Access List (Automation) (*)	Current Plus Prior Year	Corporate
Review System Values for Changes (*)	Current Plus Prior Year	Corporate
Scheduled Jobs Log (*)	Current Plus Prior Year	Corporate
Server Backup Logs (*)	Current Plus Prior Year	Corporate
Tape Backup Daily Log (*)	Current Plus Prior Year	Corporate
Vendor and Consulting Contracts and Service Agreements	Term of Contract Plus 3 Years	Corporate
Web Filtering Activity Logs (*)	3 Months	Corporate
LEGAL	RETENTION PERIOD (IF "LONGER OF TAX HOLD" IS NOTED, REFER TO SECTION 7 FOR TAX HOLDS INVOLVING LEGACY ALLIED WASTE LOCATIONS)	APPLICABLE TO CORPORATE AND/OR FIELD
Acquisitions, Divestitures and Merger Agreements and Due Diligence	Indefinitely	Corporate
Articles, By-laws and Minute Books (Charter Documents)	Indefinitely	Corporate
Board of Directors and Board Committee Meeting Materials	Indefinitely	Corporate
Contracts or Agreements (not referenced in other sections)	Longer of Tax Hold or Life of Contract Plus 7 Years	Corporate and Field
Department of Justice Compliance Project	3 Years After Expiration of Project (as determined by Legal Department)	Corporate
Employee Hotline Reports and Investigation Data (AWARE Line and legacy Global Compliance) (*)	Indefinitely	Corporate
General Legal Correspondence	Current Plus Prior Year	Corporate
Third Party Subpoenas/Information Requests	2 Years from the Date of Production	Corporate
Litigation Files and Related Subpoenas (not referenced in other sections such as Human Resources and Risk Management)	Determined by Legal Department on a case by case basis	Corporate
Memoranda/Written Legal Advice	Indefinitely	Corporate
Policies (Corporate Policy and Procedures Manuals) (*)	Indefinitely	Corporate (upon being superseded)
Political Contribution Request Forms (*)	Indefinitely	Corporate
Real Estate Documents (includes titles, surveys, deeds, easements and leases)	Indefinitely	Corporate and Field
SEC Filing Binders to include original signature pages for the various filings (coordinate with Accounting - Financial /External Reporting Department): Forms: 10-Q, 10-K, 8-K, 11-K (401-k), etc. Proxy Statements (including final proxy voting results). Registration Statements: S-3, S-8, etc. 302/906 Certifications (includes correspondence and comment letters)	Indefinitely (Final Filings) Current Plus 7 Years (Workpapers/Binders Supporting Transaction/Filing)	Corporate
Subsidiary Management (*)	Indefinitely	Corporate
Trademarks, Copyrights and Patents	Life of Trademark Plus Applicable Statute of Limitations Life of the Copyright Plus 3 Years Life of Patent Plus 6 Years	Corporate
MAINTENANCE	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Brake Certifications – In Personnel File	Term of Employment Plus 1 Year based on Ref. FMCSR 396.25(e)	Field
Dossier and Lawson Reports, Including Monthly Inventory (*)	Term of 1 Year and for 6 Months After the Motor Vehicle Leaves the Motor Carrier's Control based on Ref. FMCSR 396.3 (c)	Field
Dossier POs (*)	Term of 1 Year and for 6 Months After the Motor Vehicle Leaves the Motor Carrier's Control based on Ref. FMCSR 396.3 (c)	Field
Dossier Work Orders (*)	Term of 1 Year and for 6 Months After the Motor Vehicle Leaves the Motor Carrier's Control based on Ref. FMCSR 396.3 (c)	Field
Equipment Titles	For the Life of the Equipment or Until Sold or Otherwise Disposed	Field



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MAINTENANCE (continued)	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Maintenance Files (e.g., Brake Inspections and Repairs)	Term of 1 Year and for 6 months After the Motor Vehicle Leaves the Motor Carrier's Control Based on Ref. FMCSR 396.3 (c)	Field
Maintenance Training Log (* if available)	Term of Employment plus 1 year Based on Ref. FMCSR 396.25 (e)	Field
Mandatory Maintenance Personnel Training (* if available)	Term of Employment plus 1 year Based on Ref. FMCSR 396.25 (e)	Field
Manifests for Waste Oil or Other Hazardous Waste	Indefinitely	Field
PMI Forms	Term of 1 Year and for 6 months After the Motor Vehicle Leaves the Motor Carrier's Control based on Ref. FMCSR 396.3 (c)	Field
Vehicle Condition Reports (VCRs)	Current Month Plus 90 Days	Field
Vehicle History Reports	Term of 1 year and for 6 months After the Motor Vehicle Leaves the Motor Carrier's Control based on Ref. FMCSR 396.3 (c) unless directed by Risk Management to retain longer for Accident Claim	Field
Warranty Claims	Life of Truck Plus 6 Months After Disposition	Field
Any Records under this Section (as determined by the Division) that are utilized to comply with the International Fuel Tax Agreement (IFTA) Permit and Tax Liability Guidance (applies only to Divisions having vehicles subject to IFTA Returns)	4 Years (IFTA Requirement)	Field
MARKET DEVELOPMENT	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Confidentiality Agreements	Term of Agreement Plus 3 Years	Corporate
Contract Drafts	Discard Draft after Contract is Executed	Corporate
Market Planning and Analysis	Indefinitely	Corporate and Field
Transaction Files: <ul style="list-style-type: none"> Closing Notice Contract Checklist Contracts and Agreements Disposal Maps Due Diligence Letter of Intent Memorandums News Clippings Offer Letter Offering Memorandum Post Transaction Review Pro Forma Models Project Execution Plan Project Feasibility Analysis Seller Valuation Seller's Information Transaction Analysis Transaction Report 	Indefinitely for Closed Transactions; Otherwise 7 Years	Due to Size and Complexity of Transaction, VP MP&D or EVP BD will determine if Stored at Corporate or Field
OPERATIONS - COLLECTIONS	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Driver Check-In (Route Sheets)	Current Plus 3 Months	Field
Driver Check-In (Route Sheets) – Only Divisions that have vehicles complying with the International Fuel Tax Agreement (IFTA) Permit and Tax Liability Guidance	4 Years (IFTA Requirement)	Field
Routing Tool Solutions (*)	6 Months	Field
PAYROLL	RETENTION PERIOD (IF "LONGER OF TAX HOLD" IS NOTED, REFER TO SECTION 7 FOR TAX HOLDS INVOLVING LEGACY ALLIED WASTE LOCATIONS)	APPLICABLE TO CORPORATE AND/OR FIELD
Bonus Payment Calculations and Worksheets (*)	Current Plus 5 Years	Corporate
Deferral Elections (Salary and Bonus) (*)	Term of Employment Plus 3 Years	Corporate
DOT Meal Period Certification (*)	Term of Employment Plus 6 Years	
Employee Time Cards (Paper Copy) Signed by Employee	Current Plus 3 Years	Corporate and Field
Incentive Wage Calculation Worksheets (*)	Current Plus 3 Years	Field
Kronos Time Records (*)	Current Plus 3 Years	Corporate and Field
Payroll Tax Returns (*)	Longer of Tax Hold or Current Plus 4 Years	Corporate



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PAYROLL (continued)	RETENTION PERIOD (IF "LONGER OF TAX HOLD" IS NOTED, REFER TO SECTION 7 FOR TAX HOLDS INVOLVING LEGACY ALLIED WASTE LOCATIONS)	APPLICABLE TO CORPORATE AND/OR FIELD
Sales Commissions Calculations and Worksheets (*)	Current Plus 3 Years	Field
W-2s (*)	Longer of Tax Hold or Current Plus 3 Years	Corporate
Wage Garnishments/Child Support	Term of Employment or 5 Years After Court Order Expires, Whichever is Later	Corporate and Field
Weekly Payroll Reports (Signed Off) –PR141, Employee Change Audit, Kronos Production Pay Report, Pay Rate Exception Audit Report (*)	Longer of Tax Hold or Current Plus Prior Year	Corporate and Field
PROCUREMENT	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Card Applications (Pcard, T&E Card, Fuel Card)	3 Years After Revocation Date	Corporate
Memos of Understanding/Letters of Intent (*)	Term Plus 3 Years	Corporate and Field
Purchase Orders (*)	Term Plus 10 Years	Corporate and Field
Statements of Work (*)	Term Plus 3 Years	Corporate and Field
Vendor Contracts/Agreements (*)	Term Plus 3 Years	Corporate and Field
Vendor Quotations/Proposals (*)	Term Plus 90 Days	Corporate and Field
Sourcing Strategy Documentation (*)	Term Plus 3 Years	Corporate
RISK MANAGEMENT	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Captive Documentation (*): • Bom Ambient • Saguaro National Insurance Company (SNIC) • Global Indemnity - Surety	Indefinitely	Corporate
Certificates of Insurance (*): • Third Party Vendors/Contractors/Suppliers	Term Plus 10 Years	Corporate and Field
Financial Assurance – Copies (*) • Bonds (Closure, Post Closure, Performance, Misc.) • Insurance Policies	Term of Instrument	Corporate
Insurance Policies (*): • For Coverage Including Expiring • Includes Applications and Binders	Indefinitely	Corporate
Litigation Files (*)	1 Year After Litigation Closes	Corporate
SAFETY	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
DOT – Recordable Accident Register	3 Years	Field
DOT Driver's Hour Log (Driver's Duty Status Record)	6 Months	Field
Driver Qualification File: • Driver Application for employment (DOT Application for Employment) • State Agency Driver's Driving Record (Motor Vehicle Record (MVR)) • Certificate of Driver's Road Test • State Agency Annual Driver Record Inquiry (MVR covering at least the preceding 12 months) • Annual Review of the Driver's Driving Record • List or Certificate relating to Violations of Motor Vehicle Laws and Ordinances (continued on next page)	Term of Employment Plus 3 Years	Field



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SAFETY (continued)	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Driver Qualification File (continued): <ul style="list-style-type: none"> Medical Examiner's Certificate of his/her Physical Qualification to Drive a Commercial Motor Vehicle or a Legible Photographic Copy of Certificate A Letter from the Field Administrator, Division Administrator or State Director Granting a Waiver of a Physical Disqualification, if Waiver Issued 		
Employee Medical Records (Annual Audiograms, Respirator Medical Certifications)	Term of Employment Plus 30 Years	Field
Facility Inspections (Includes Fire Inspection Reports)	Current Plus Prior 12 Months	Field
Health, Medical, Safety Data: <ul style="list-style-type: none"> Blood-Borne Pathogen Exposure Records Medical Exams Job Related Illnesses and Injuries Toxic Substance Exposure Records 	30 Years 30 Years 5 Years 30 Years	Field
Industrial Hygiene Air Survey Results	Indefinitely	Corporate
Industrial Hygiene Noises Survey Results	Indefinitely	Corporate
Material Safety Data Sheets (MSDS) – Active and Obsolete	30 Years Following Determination of Obsolescence	Field
OSHA 300 Log (Workpaper Injuries)	5 Years	Corporate and
OSHA 301 Supplemental Reports by Employee	5 Years	Corporate and Field
OSHA Written Compliance Programs	Indefinitely	Field
Positive Reports Summary (Drug Testing Binder)	5 Years	Corporate and Field
Republic Safety Operation Program (ReSOP) Observations	Current Plus Prior 12 Months	Field
Safety Programs Manuals (*if available)	Until Superseded	Corporate (Company-wide Master) and Field (Local Master)
Safety Training – Attendance Logs for Annual/Monthly Training (All Employees)	Current Plus Prior 12 Months	Field
Safety Training – Materials and Videos	Until Superseded	Corporate and Field
Safety Training – New Hire/Orientation Training (Personnel Files)	Term of Employment Plus 6 Years	Field
Site Visit Reports	Current Plus Prior 12 Months	Field
Traffic Citations	2 Years Following Resolutions	Field
SALES (Includes National Accounts)	RETENTION PERIOD (IF "LONGER OF TAX HOLD" IS NOTED, REFER TO SECTION 7 FOR TAX HOLDS INVOLVING LEGACY ALLIED WASTE LOCATIONS)	APPLICABLE TO CORPORATE AND/OR FIELD
Commercial, Industrial and Residential New Customer Reports (should include equivalent reporting for InfoPro) (*)	Longer of Tax Hold or 7 Years	Corporate
CRMS Data (*)	Longer of Tax Hold or 3 Years	Corporate (Electronic Backup of CRMS Database)
Lawson – Price Increase (PI) Trend Report (*)	7 Years	Corporate and Field
Lawson – Sales Trend Report (*)	7 Years	Corporate and Field
Market Place Sales Review by Division (*if available)	Current Version	Field
Municipal Services Agreements/Contracts – Signed	Longer of Tax Hold or Term of Contract Plus 7 Years	Field
New and Lost Customer Report – Signed	Current Plus Prior Year	Field
ROI Model (Customer Specific) (*)	Life of Customer Contract	Field
Service Agreements – Signed	Longer of Tax Hold or Term of Contract Plus 7 Years	Field
Street Price List and Related Assumptions/Facts	Current Plus Prior Version	Field
National Accounts	RETENTION PERIOD	APPLICABLE TO CORPORATE
Bid Activity (*)	7 Years	Corporate
Customer List (Spreadsheet) (*)	Longer of Tax Hold or 7 Years	Corporate
Master Contracts and Final Schedule A's	Longer of Tax Hold or Life of Contract Plus 3 Years	Corporate
Oakleaf Schedule A (*)	Life of Service of Location Plus 3 Years	Corporate
RSI Reports (*): <ul style="list-style-type: none"> Customers Total Billed Monthly/Daily Cash Receipts Summary AR Aging Report 	7 Years	Corporate



Policy No.: LGL-111

Initial Release Date: 05/05/2011

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TREASURY	RETENTION PERIOD	APPLICABLE TO CORPORATE AND/OR FIELD
Account Signatory Files	Two Years After the Account Closed	Corporate
Bank Fee Reports	7 Years	Corporate
Bank Service Agreements	Term of Contract Plus 3 Years	Corporate
Daily Cash Book (*)	7 Years	Corporate
Debt Issuances and Related Records	Term of Agreement Plus 7 Years	Corporate and Field
Dividend Records	Indefinitely	Corporate
Electronic User Access Forms	Current and Prior Year	Corporate
Financial Assurance Files (Closure and Post Closure)	Indefinitely	Corporate
Letters of Credit Files	Term of Letter Plus 3 Years	Corporate
Mortgages and Notes (Expired)	10 Years After Disposition of Asset	Corporate
Republic Services, Inc. Stock (including stock certificates and transfer lists)	Indefinitely	Corporate
Tax Exempt Bond Reimbursements and Supporting Documents	Term of Bond Plus 7 Years	Corporate
Trust and Escrow Accounts and Files	Term of Agreement Plus 7 Years	Corporate and Field
Weekly Cash Forecast	Current Plus Prior Year	Corporate
Wire Transfers	7 Years	Corporate



Republic Services, Inc.

Document Retention
Policies and Procedures Manual

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1. Document History

The table below documents the creation, approval and ownership information for the original version of this document:

Prepared By: David Barclay, Senior Vice President and General Counsel	Date Prepared: March 19, 2007
Reviewed By: Policies and Procedures Management Team	Date Reviewed: June 22, 2007
Approved By: Tod Holmes, Senior Vice President and Chief Financial Officer	Date Approved: June 22, 2007

The table below provides the evidence of changes made to the document since its original publication:

Requestor	Date Requested	Version / Revision	Reason for Change	Approvers


Contacts:

- David Barclay, Senior Vice President and General Counsel
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- Paul Connealy, Vice President of Tax
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 - (954) 769-2657

References:

- No references exist for this section of the manual.

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 REPUBLIC SERVICES	<div>Document Retention</div> <div>Function: Document Retention Inventory and Retention Schedule</div>
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2. Purpose

The purpose of this section of the Policies and Procedures Manual ("PPM") is to document Republic Services, Inc.'s ("Republic" or the "Company") approved policies and procedures for the review, retention and disposal of electronic and hard copy documents received or created in the course of business. This document establishes guidelines for the following:

- Reviewing and identifying documents that need to be retained by business function.
- Identifying document retention periods.
- Disposing of documents that have reached the expiration period.

3. Responsible Parties


The responsible parties for the Document Retention policies and procedures included in this document are the following:

- Business owner: Senior Vice President and General Counsel
- Reviewers and approvers:
 - Board of Directors
 - Chairman and Chief Executive Officer
 - Senior Vice President and Chief Financial Officer
 - President and Chief Operating Officer
 - Policies and Procedures Management Team
- Affected groups:
 - Vice President of Tax
 - Corporate Legal department
 - Corporate department heads
 - Regional Vice Presidents
 - Regional Controllers
 - Area Presidents
 - Area Controllers
 - General Managers
 - Division Controllers
 - Corporate, Regional, Area and Division personnel

The key roles and responsibilities of the individuals who perform the actions of this PPM are as follows:


- **Senior Vice President and General Counsel**
 - Review and approve the Document Retention Inventory and Retention Schedule.
 - Keep Corporate officers, management and employees apprised of changes to the Company's Document Inventory Retention Schedule.

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 REPUBLIC SERVICES	Document Retention
	Function: Document Retention Inventory and Retention Schedule


- Issue a "Litigation Hold" memorandum or other notice to suspend the destruction of potentially relevant documents upon the occurrence of events that could likely lead to litigation.
- Send a communication to Corporate, Regional, Area and Division personnel annually requiring them to review the Document Retention Inventory and Retention Schedule, identify documents that have reached their expiration period and dispose the identified documents.
- **Vice President of Tax (VP of Tax)**
 - Annually review and approve Document Retention Inventory and Retention Schedule.
- **Corporate Legal department**
 - Provide guidance on Document Retention and destruction procedures.
- **Corporate department heads**
 - Review the Document Retention Inventory and Retention Schedule annually to identify additions or modifications.
 - Contact the Corporate Legal department with questions related to Document Retention and destruction procedures.
- **Regional Vice Presidents (RVP)**
 - Review the Document Retention Inventory and Retention Schedule annually to identify additions or modifications.
 - Contact the Corporate Legal department with questions related to Document Retention and destruction procedures.
- **Regional Controllers (RC)**
 - Review the Document Retention Inventory and Retention Schedule annually to identify additions or modifications.
 - Contact the Corporate Legal department with questions related to Document Retention and destruction procedures.
- **Area Presidents (AP)**
 - Review Document Retention Inventory and Retention Schedule annually to identify additions or modifications.
 - Contact the Corporate Legal department with questions related to Document Retention and destruction procedures.
- **Area Controllers (AC)**
 - Review the Document Retention Inventory and Retention Schedule annually to identify additions or modifications.
 - Contact the Corporate Legal department with questions related to Document Retention and destruction procedures.
- **General Managers (GM)**
 - Review the Document Retention Inventory and Retention Schedule annually to identify additions or modifications.
 - Contact the Corporate Legal department with questions related to Document Retention and destruction procedures.

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 REPUBLIC SERVICES	Document Retention
	Function: Document Retention Inventory and Retention Schedule

- ***Division Controllers (DC)***
 - Review the Document Retention Inventory and Retention Schedule annually to identify additions or modifications.
 - Contact the Corporate Legal department with questions related to Document Retention and destruction procedures.
- ***Corporate, Regional, Area and Division personnel***
 - Review the Document Retention Inventory and Retention Schedule to identify documents that need to be retained and how long documents should be retained.
 - Adhere to the Document Retention Inventory and Retention Schedule.
 - Contact the Corporate Legal department with questions related to Document Retention and disposal procedures.
 - Identify and track documents that have reached the Document Retention expiration period.
 - Dispose of documents on a timely basis that have reached their expiration date in a secure manner to prevent unauthorized access to such documents.
 - Cease the destruction of potentially relevant documents upon receipt of a "Litigation Hold" memorandum or other notice from the Senior Vice President and General Counsel or other attorney in the Corporate Legal department.

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 REPUBLIC SERVICES	Document Retention
	Function: Document Retention Inventory and Retention Schedule

4. Document Retention

4.1. Policies

Republic's policy is to ensure that Company documents are maintained as mandated by state and federal laws (including Sarbanes-Oxley) and in accordance with Republic's business and audit needs. Such documents include but are not limited to records from the following functional areas:

- Accounting
- Corporate Accounts
- Financial Reporting
- Human Resources
- Environmental Compliance and Engineering
- Information Technology
- Internal Audit
- Legal
- Market Development
- Maintenance
- Operations
- Risk Insurance
- Safety
- Sales
- Treasury

Annually, the RVP, RC, AP, AC, GM, DC and Corporate department heads review the Document Retention Inventory and Retention Schedule to identify additions or modifications. Any changes to the Document Retention Inventory and Retention Schedule must be approved by the Senior Vice President and General Counsel and the VP of Tax.


Corporate, Regional, Area and Division personnel must adhere to the Document Retention Inventory and Retention Schedule.

It is Republic's policy that no Corporate or field records are destroyed until the Document Retention period has been fulfilled. Upon the occurrence of events that could likely lead to litigation and the issuance by the Corporate Legal department of a "Litigation Hold" memorandum or other notice, all record destruction of documents potentially relevant to the litigation must cease immediately.

4.2. Limits of Authority

The Senior Vice President and General Counsel and VP of Tax review and approve the Document Retention Inventory and Retention Schedule. Through the issuance of a "Litigation Hold" memorandum or other notice, the Senior Vice President and General Counsel or other attorney in the Corporate Legal department suspends the destruction of potentially relevant documents upon the occurrence of events that could likely lead to litigation.

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 REPUBLIC SERVICES	Document Retention
	Function: Document Retention Inventory and Retention Schedule

4.3. Procedures and Key Controls

The following steps document the Company's procedures for Document Retention:

1. Reviewing Retention Documents

- 1.1. Annually, the RVP, RC, AP, AC, GM, DC and Corporate department heads review the Document Retention Inventory and Retention Schedule to identify additions or modifications. Changes to the Document Retention Inventory and Retention Schedule are submitted to the Senior Vice President and General Counsel and VP of Tax for review and approval.
- 1.2. The Senior Vice President and General Counsel and VP of Tax review and approve the Document Retention Inventory and Retention Schedule.
- 1.3. The Senior Vice President and General Counsel ensures that Corporate officers, management and other Company employees are apprised of changes to the Document Retention Inventory and Retention Schedule.
- 1.4. Corporate, Regional, Area, and Division personnel review the Document Retention Inventory and Retention Schedule (see Exhibit 4.4.1) to identify documents that need to be retained and the length of time such documents should be retained. Records are organized by business function.


2. Retaining Documents

- 2.1. Corporate, Regional, Area, and Division personnel must retain all records as specified in the Document Retention Inventory and Retention Schedule (see Exhibit 4.4.1).
- 2.2. Paper documents shall be retained for a period no longer than specified in the Document Retention Inventory and Retention Schedule unless otherwise specified by the Senior Vice President and General Counsel. Electronic documents shall be retained for the lesser of seven years or as otherwise specified in the Document Retention Inventory and Retention Schedule.
- 2.3. Records shall be retained by location (e.g., Corporate, field, or Corporate and field), as identified in the Document Retention Inventory and Retention Schedule. Records shall be retained in a secure site to prevent unauthorized access.
- 2.4. Corporate, Regional, Area, and Division personnel should contact the Corporate Legal department for questions related to Document Retention guidelines.

3. Disposing of Retained Documents

- 3.1. Annually, the Senior Vice President and General Counsel sends a communication to Corporate, Regional, Area, and Division personnel requiring them to review the Document Retention Inventory and Retention Schedule (see Exhibit 4.4.1) and to identify documents that have reached their expiration date and must be disposed.
- 3.2. The Senior Vice President and General Counsel or other attorney in the Corporate Legal department issues a "Litigation Hold" memorandum or other notice to suspend the destruction of potentially relevant documents upon the occurrence of events that could likely lead to litigation.
- 3.3. Corporate, Regional, Area and Division personnel cease the destruction of potentially relevant documents upon receipt of a "Litigation Hold" memorandum or other notice from the Senior Vice President and General Counsel or other attorney in the Corporate Legal department.


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 REPUBLIC SERVICES	Document Retention
Function: Document Retention Inventory and Retention Schedule	

- 3.4. Corporate, Regional, Area, and Division personnel dispose of documents that have reached their expiration date in a secure-manner to prevent unauthorized access to such documents.
- 3.5. Corporate, Regional, Area, and Division personnel should contact the Corporate Legal department with questions related to document disposal procedures.

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 REPUBLIC SERVICES	Document Retention
	Function: Document Retention Inventory and Retention Schedule

4.4. Exhibits

4.4.1. Document Retention Inventory and Retention Schedule

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5. Definitions

Document Retention Inventory and Retention Schedule: Spreadsheet file that identifies electronic and hard copy documents that need to be retained, the period of time that documents need to be retained for, and the location (e.g., Corporate, field, or Corporate and field), where the documents are to be retained. Documents are organized by business function in the spreadsheet and each function is separated into tabs. The business functions include the following: Accounting (Accounts Receivable), Accounting (Cash), Accounting (Accounts Payable), Accounting (Asset Management), Accounting (Taxes), Accounting (General), Budgets/ Planning, Market Development, Human Resources, Payroll, Information Technology, Legal, Risk Management, Treasury, Sales, Corporate Accounts, Maintenance, Internal Audit, Operations (Landfill), Operations (Collections), Safety, and Financial Reporting.

Document Retention: Refers to the retention of all business records, including written, printed and recorded materials.

Litigation Hold: Suspension of the Company's document retention and disposal policies for those documents that may be relevant to a lawsuit that has been actually filed or one that is reasonably anticipated.

Retention Schedule: Period for which the Company's business records should be retained to meet its operational needs and to comply with legal requirements.

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Accounting - AP

Category	Document Name	Class	Location	Retention Period
Accounting - A/P	1099 Forms and Filings	Confidential	Field	Current plus 7 prior years
Accounting - A/P	AP Control Log - Signed	SOX	Field	Current plus prior year
Accounting - A/P	AP190 - Invoice Reinstatement	SOX	Field	Current plus prior year
Accounting - A/P	AP220 Batch Report - Signed	SOX	Field	Current plus prior year
Accounting - A/P	Manual POs	SOX	Field	Current plus prior year
Accounting - A/P	PO Logs - Electronic	SOX	Field	Current plus prior year
Accounting - A/P	Disposal Tickets for Republic Using External Sites	Internal Use Only	Field	3 years
Accounting - A/P	Driver Check-in (Route Sheets)	Internal Use Only	Field	3 years
Accounting - A/P	AP 136 and GL290 to Reconcile	Confidential	Field	Current plus 7 prior years
Accounting - A/P	AP Invoices with Receiving Documents - Signed	Confidential	Field	Current plus 7 prior years
Accounting - A/P	AP Month-end Closing Documents	Confidential	Field	Current plus prior year
Accounting - A/P	Voided Checks	Confidential	Field	Destroy Immediately
Accounting - A/P	Escheat Returns-Paper Documents	Confidential	Field	Indefinitely
Accounting - A/P	W-9 Forms	Confidential	Field	The greater of 7 years or the term during which we utilize the vendor

Accounting - AR

Category	Document Name	Class	Location	Retention Period
Accounting - A/R	Control report from billing outsourcer (verification report signed by billing clerk)	SOX	Field	Current plus prior year
Accounting - A/R	Monthly Approved List of Accounts Not to Lock - Signed	SOX	Field	Current plus prior year
Accounting - A/R	Monthly Automated Sales Report (ASR) - Signed	SOX	Field	Current plus prior year
Accounting - A/R	Monthly Merchant Statement from Credit Processor	SOX	Field	Current plus prior year
Accounting - A/R	Sales & Adjustment Report for Current Month - Signed	SOX	Field	Current plus prior year
Accounting - A/R	Collection / Stop Service Policy	Confidential	Field	Current and prior version
Accounting - A/R	Customer Complaint Files (in the F9 notes in RSI) - Electronic	Confidential	Field	Current plus 7 prior years
Accounting - A/R	Customer File, Including Credit Application and Supporting Documentation	Confidential	Field	Term of the contract plus 3 years
Accounting - A/R	Credit Reports for New Customers (Customer File)	Confidential	Field	Term of the contract plus 3 years
Accounting - A/R	Customer Service Records (Hard copy and Electronic in F9 notes in RSI)	Confidential	Field	Hard copy: Term of the contract plus 3 years Electronic: 7 years
Accounting - A/R	Daily Ticket Reconciliations	SOX	Field	Current plus prior year
Accounting - A/R	Day End Sales and Adjustment batches by user ID	SOX	Field	Current plus prior year
Accounting - A/R	Monthly Open Work Order Report	SOX	Field	Current plus prior year
Accounting - A/R	New Customer Reports (RP1403, RP1404, RP1407)	SOX	Field	Current plus prior year
Accounting - A/R	PC Scale Day End Report	SOX	Field	Current plus prior year
Accounting - A/R	RSI Batch Reports (for batch posting)	SOX	Field	Current plus prior year
Accounting - A/R	RSI Month End Report Used to Support Posting to the GL and Reconciliations of RSI to GL	Confidential	Field	Current plus 7 prior years
Accounting - A/R	Sales Report Current/Deferred by GL Code	Confidential	Field	Current plus 7 prior years
Accounting - A/R	Customer POs	Confidential	Field	Term of the contract plus 3 years
Accounting - A/R	Customer Service Agreements	Confidential	Field	Term of the contract plus 3 years
Accounting - A/R	Bankruptcy Documents	Confidential	Field	One year after conclusion of the matter

Accounting - Asset Management

Category	Document Name	Class	Location	Retention Period
Accounting - Asset Management	Annual Container Inventory Reconciliation Support	SOX	Field	Current plus prior year
Accounting - Asset Management	Annual Fixed Asset Physical Reports and Reconciliations	SOX	Field	Current plus prior year
Accounting - Asset Management	Approved CEs, Real Property CEs and Supporting Documentation	SOX	Field	Current plus prior year
Accounting - Asset Management	Approved CRs	SOX	Field	Current plus prior year
Accounting - Asset Management	Approved CTs and Supporting Documentation	SOX	Field	Current plus prior year
Accounting - Asset Management	CETA B4 Reports to Karen Specland - Electronic	SOX	Field	7 years
Accounting - Asset Management	Asset Management Monthly Closing Report	Confidential	Corporate	Current plus 7 prior years
Accounting - Asset Management	Monthly or Quarterly Physical Inventory Count (Parts Inventory)	Confidential	Field	Current plus prior year
Accounting - Asset Management	Monthly Surplus Equipment Reports	Internal Use	Field	Current plus prior year
Accounting - Asset Management	Contracts, Agreements and Invoices to Purchase Fixed Assets	Internal Use	Corporate/Field	Life of asset through date of disposal plus 1 year
Accounting - Asset Management	Contract or Agreement to Sell Fixed Assets	Internal Use	Corporate/Field	7 years from date of sale
Accounting - Asset Management	Approved Invoices for Capital Assets	Internal Use	Corporate/Field	Life of asset plus 1 year
Accounting - Asset Management	RS270 Asset Reconciliation - signed off	SOX	Corporate	Current plus prior year

Accounting - Cash

Category	Document Name	Class	Location	Retention Period
Accounting - Cash	Petty Cash Surprise Counts	SOX	Field	Current plus prior year
Accounting - Cash	Cash Balance Sheet Reconciliation Folder:	Confidential	Field	Current plus 7 prior years
	- Bank Reconciliation			
	- Bank Statements			
	- Copies of Deposit Tickets			
	- Support for unusual reconciling items			
	- List of outstanding checks			
	- Daily Cash Receipts Summary RSI			
	- Deposit Ticket Report - RSI			
	- Month End Cash Receipts Journal RSI			
Accounting - Cash	Cash Receipts Log	Confidential	Field	Current plus 7 prior years
Accounting - Cash	Cancelled Checks	Confidential	Field	Current plus 7 prior years

Accounting - General

Category	Document Name	Class	Location	Retention Period
Accounting - General	Payroll Exception Report, e.g., 4 weeks no pay and average hours less than 30	SOX	Corporate/Field	Current plus prior year
Accounting - General	Lawson/Essbase Balancing Report - signed off	SOX	Corporate	Current plus prior year
Accounting - General	Lawson Daily Exception Report - signed off	SOX	Corporate	Current plus prior year
Accounting - General	Account Analysis Folder (or other documentation supporting account balances):	Confidential	Field	Current plus 7 prior years
	Supporting schedules			
	Periodic reconciliations of schedules to accounts being analyzed			
	Supporting documentation such as agreements, contracts, copies of invoices and checks, and correspondence			
Accounting - General	Sales Journal by Cycle and Supporting Documentation for Revenue JE	Confidential	Corporate	Current plus 7 prior years
Accounting - General	Normal and Intercompany Journal Entries and Supporting Documentation	Confidential	Corporate/Field	Current plus 7 prior years
Accounting - General	Lawson Accounting Reports, e.g., Financial Statements, Statistical Reports, Productivity Reports - Electronic	Confidential	Corporate/Field	7 years
Accounting - General	Level 3 P & L - Electronic	Confidential	Corporate/Field	7 years
Accounting - General	Aged Trial Balance Summary - Electronic	Confidential	Corporate/Field	7 years
Accounting - General	Close Month-end Report - Electronic	Confidential	Corporate/Field	7 years
Accounting - General	Month-end Close & Statistics Files - Electronic	Confidential	Corporate/Field	7 years
Accounting - General	Lawson configuration security requests for new company (email)	Internal Use	Corporate	3 years
Accounting - General	Internal and external audit reports other than the auditors of the Company's consolidated financial statements	Confidential	Division	Current plus 7 prior years

Accounting - Taxes

Category	Document Name	Class	Location	Retention Period
Accounting - Taxes	Administrative Files- Bills/Payments, Correspondence	Internal Use	Corporate	Current plus 7 prior years
Accounting - Taxes	Escheat Files	Confidential	Field	Indefinitely
Accounting - Taxes	Permanent Files- EFT Payments, Mergers & Acquisitions (8594) Intangibles, Elections (8023)/Methods (3115), Intangibles (Tax Basis Support) Binders	Confidential	Corporate	Indefinitely
Accounting - Taxes	Project Files - Provision, Payments/Forecasts, FIN 48 Analysis, Misc.	Confidential	Corporate	Current plus 7 prior years
Accounting - Taxes	Project Files - Restructuring (STAR), Due Diligence	Confidential	Corporate	Indefinitely
Accounting - Taxes	Audit Files - Federal, State and Other Tax Examinations	Confidential	Corporate/Field	The greater of 7 prior years or 3 years after the audit is closed
Accounting - Taxes	Tax Information Packages and Supporting Documentation	Confidential	Corporate	Current plus 7 prior years
Accounting - Taxes	Seller Pre-acquisition Final Tax Return for Stock Acquisitions	Confidential	Corporate	Indefinitely
Accounting - Taxes	Sales & Use Tax Returns - Supporting Documents	Confidential	Field	Current plus 7 prior years
Accounting - Taxes	Cash Basis Sales Tax Report	Confidential	Field	Current plus 7 prior years
Accounting - Taxes	City Business Licenses	Confidential	Field	Current plus 7 prior years
Accounting - Taxes	Annual Business License Returns	Confidential	Field	Current plus 7 prior years
Accounting - Taxes	Form 2290 Returns	Confidential	Field	Current plus 7 prior years
Accounting - Taxes	IFTA Tax Forms	Confidential	Field	Current plus 7 prior years
Accounting - Taxes	Weight Distance Tax Forms	Confidential	Field	Current plus 7 prior years
Accounting - Taxes	Year-end AM Tax Data (Excel files)	Confidential	Corporate	Current plus 7 prior years
Accounting - Taxes	Personal Property Tax Returns and Supporting Schedules	Confidential	Field	Current plus 7 prior years
Accounting - Taxes	Income Tax Returns - Electronic	Confidential	Corporate	7 years

Budgets - Planning

Category	Document Name	Class	Location	Retention Period
Budgets/ Planning	Monthly Operating Review (MOR) Books and MOR Notes and Reviews (hard copies)	Confidential	Corporate	3 months
Budgets/ Planning	Budget Reconciliation File	Confidential	Corporate	Current plus prior year
Budgets/ Planning	Budget Files Used to Create Annual Operating Budgets - Electronic	Confidential	Corporate	Until June 30th of the following budget year
Budgets/ Planning	MOR Notes Database - Electronic	Confidential	Corporate	Current plus 7 prior years
Budgets/ Planning	Monthly MOR Reports - Electronic	Confidential	Corporate	Current plus 7 prior years
Budgets/ Planning	Monthly/Quarterly Essbase Reports - Electronic	Confidential	Corporate	Current plus 7 prior years

Corporate Accounts

Category	Document Name	Class	Location	Retention Period
Corporate Accounts	Oakleaf Schedule A	Internal Use	Field	Life of service of location plus 3 years
Corporate Accounts	Wal-Mart Award Letter	Internal Use	Field	Life of service of location plus 3 years
Corporate Accounts	Corporate Accounts Bid Activity - Electronic	Internal Use	Corporate	7 years
Corporate Accounts	Master Contracts for Corporate Accounts	Internal Use	Corporate	Life of contract plus 3 years
Corporate Accounts	RSI Reports (Customers Total Billed, Monthly/Daily Cash Receipts Summary, AR Aging Report) - Electronic	Internal Use	Corporate	7 years
Corporate Accounts	Corporate Account Customer List (Spreadsheet) - Electronic	Internal Use	Corporate	7 years

Financial Reporting

Category	Document Name	Class	Location	Retention Period
Financial Reporting	Internal and external audit reports other than the auditors of the Company's consolidated financial statements	Confidential	Corporate	Current plus 7 prior years
Financial Reporting	SFAS 123(R) Binders	Confidential	Corporate	Current plus 7 prior years
Financial Reporting	SFAS 143 Binders	Confidential	Corporate	Current plus 7 prior years
Financial Reporting	Documents Supporting Specific Transactions or Filings with the SEC	Confidential	Corporate	Indefinitely
Financial Reporting	Monthly Information Concerning Executive Personal Use of Corporate Aircraft Including Flight Logs	Confidential	Corporate	Current plus 7 prior years
Financial Reporting	Quarterly Calculation of Interest Rate Swap Activity Including Confirmations from Counter-Parties	Confidential	Corporate	The greater of 7 years or the term of the swap
Financial Reporting	10-K Binders	Confidential	Corporate	Indefinitely
Financial Reporting	10-Q Binders	Confidential	Corporate	Indefinitely
Financial Reporting	401(k) Plan 11-K Binders	Confidential	Corporate	Indefinitely
Financial Reporting	Acquisition and Divestiture Files and Binders	Confidential	Corporate	Indefinitely
Financial Reporting	Quarterly Representation Letters	Confidential	Corporate	Indefinitely
Financial Reporting	S-1, S-3 Binders	Confidential	Corporate	Indefinitely
Financial Reporting	SEC Filings – Permanent files	Confidential	Corporate	Indefinitely
Financial Reporting	Quarterly External Financial Reporting Binders & Schedules (Brown Folders)	Confidential	Corporate	Indefinitely
Financial Reporting	SFAS 143 and 123(R) Calculations/Databases	Confidential	Corporate	Current plus 7 prior years
Financial Reporting	Bom Ambiente Accounting binders	Confidential	Corporate	Current plus 7 prior years

Human Resources

Category	Document Name	Class	Location	Retention Period
Human Resources	Recruiting Records - should be kept in file(s) separate from individual personnel files	Confidential	Field	Current plus 2 years prior
	- Job Applications of those not hired			
	- Resumes			
	- Records Relating to Refusal to Hire (applicant Flow log)			
	- Advertisements about openings (includes unemployment office postings)			
	- EEO/Invitation to Self-identify (keep in separate binder)			
Human Resources	Positive Reports Summary (Drug testing binder)	Confidential	Field	3 years
Human Resources	I-9 Forms (Separate into two binders: Active and Terminated)	Confidential	Field	Term of employment plus 3 years
Human Resources	Child Support/Wage Garnishments	Confidential	Corporate	Term of employment plus 3 years
Human Resources	Individual Personnel File:	Confidential	Field	Term of employment plus 3 years
	- Job description			
	- Employment application			
	- Resume			
	- Background verification and release			
	- Records relating to Hiring, Promotion, Demotion, Transfer, Layoff, Rates of Pay and other forms of compensation, e.g., Offer letter, W-4, PAF, etc.			
	- Signed Policy Acknowledgements, e.g., Introductory Employment Period, SCIA, Drug & Alcohol Policy, Employee Handbook, Compliance Certificate, etc.			
	- Training Records, Scores and Certifications			
	- Letters of Recognition			
	- Documents used to make an employment decision, e.g., Assessments			
	- Disciplinary Notices or Documents			
	- Performance Evaluations			
	- Exit Interview			
	- Termination Records			
	- Personnel Action Forms			
	- Non Compete/Confidentiality Agreement			
	- EEO/Invitation to Self-identify			
	- Disability or Veteran Status Records			
	- Leave of Absence Documents, e.g., Physician's Certification, medical release, etc.			
	- Annual and Long-Term Compensation			
	- User Roles and Profiles Request Forms (RSI/Lawson/Kronos/Route Smart/PC Scale/Network)			
	Terms of Use Agreement & MSAM Access Form			
	- Driver Qualification File:			
	1. Driver Application for employment (DOT Driver Application for Employment – Form B and B-1)			
	2. State agency Driver's Driving Record (Motor Vehicle Record (MVR))			
	3. Certificate of Driver's Road Test (Certification of Road Test – Form E)			
	4. State agency Annual Driver Record Inquiry (MVR covering at least the preceding 12 months)			
	5. Annual Review of the Driver's Driving Record (Annual Review of Driving Record – Form I)			
	6. List or Certificate relating to Violations of Motor Vehicle Laws and Ordinances (Driver's Annual Certification – Form H)			

Human Resources

Category	Document Name	Class	Location	Retention Period
	7. Medical Examiner's Certificate of his/her Physical Qualification to Drive a Commercial Motor Vehicle or a legible photographic copy of the certificate			
	8. A Letter from the Field Administrator, Division Administrator, or State Director granting a waiver of a physical disqualification, if a waiver was issued			
Human Resources	Grants of Equity-Based Compensation	Confidential	Corporate	Term of employment plus 3 years
Human Resources	Health, Medical, Safety Data:			
	- Job related illnesses and injuries	Confidential	Corporate	5 years
	- Requests for accommodation of disability			2 years
	- Medical exams			30 years
	- Toxic substance exposure records			30 years
	- Blood-borne pathogen exposure records			30 years
Human Resources	Global Compliance Case Management documentation, e.g., Investigation Final Report, AlertLine Report, Evidence, etc.	Confidential	Corporate	7 years

Information Technology

Category	Document Name	Class	Location	Retention Period
IT	eTeam Daily Activity Report (Help Desk System) - Electronic	SOX	Corporate	7 years
IT	Scheduled Jobs Log - Electronic/Hard Copy	SOX	Corporate	Current plus prior year
IT	RSI User Security Daily Report-Incorrect Password/Profile change - Electronic	SOX	Corporate	7 years
IT	RSIGL User Security Daily Report - Electronic	SOX	Corporate	7 years
IT	Standguard REJECT Notification Report (System Breach) - Electronic	SOX	Corporate	7 years
IT	Standguard Anti-Virus Report	SOX	Corporate	Current plus prior year
IT	Tape Backup Daily Log	SOX	Corporate	Current plus prior year
IT	Monitor iSeries SYS* User Profiles	SOX	Corporate	Current plus prior year
IT	Weekly Review of New and Deleted Job Scheduler Entries	SOX	Corporate	Current plus prior year
IT	Weekly Review of New and Deleted Users by iSeries	SOX	Corporate	Current plus prior year
IT	Review Data Center Guest Log/Review Access List (Autonation)	SOX	Corporate	Current plus prior year
IT	RSI iSeries Authorization Signature Forms	SOX	Corporate	Current plus prior year
IT	Off-Site Backup Tapes Monthly Report Review	SOX	Corporate	Current plus prior year
IT	I.T. Operations and Help Desk Monthly Statistics	SOX	Corporate	Current plus prior year
IT	Corporate Termination Weekly Report	SOX	Corporate	Current plus prior year
IT	IBM Service Tech Activity Log	SOX	Corporate	Current plus prior year
IT	Review system values for changes	SOX	Corporate	Current plus prior year
IT	iSeries general review of profiles	SOX	Corporate	Current plus prior year
IT	Standguard Audit Setup	SOX	Corporate	Current plus prior year
IT	Audit Log Cleared Events	SOX	Corporate	Current plus prior year
IT	Installation Events - Electronic	SOX	Corporate	7 years
IT	Server Startup Events - Electronic	SOX	Corporate	7 years
IT	Accounts Created Events - Electronic	SOX	Corporate	7 years
IT	Accounts Deleted Events - Electronic	SOX	Corporate	7 years
IT	Account Lockout Events - Electronic	SOX	Corporate	7 years
IT	SurfControl Blocked User Activity Report Review	SOX	Corporate	Current plus prior year
IT	Server Backup Logs	SOX	Corporate	Current plus prior year
IT	RSI Security Reviews by RBSMs	SOX	Field	Current plus prior year
IT	Annual DR Test Results	SOX	Corporate	Current plus prior year
IT	Terms of Use Agreement & MSAM Access Form for Contractors	SOX	Corporate	Current plus prior year

Information Technology

Category	Document Name	Class	Location	Retention Period
IT	Lawson Programming Log (Command line use review)	SOX	Corporate	Current plus prior year
IT	Lawson/RSI/Kronos/Route Smart/PC Scale Upgrades Testing Results	Internal Use	Corporate	Until upgrade to the next major release
IT	License agreement for software	Internal Use	Corporate	Term of agreement plus 3 years
IT	Change Management Authorization Forms	Internal Use	Corporate	3 years
IT	User roles and profiles (Lawson/Route Smart/PC Scale)	Internal Use	Field	Until superceded
IT	RSI Suggested Permissions Matrix	Internal Use	Corporate	Until superceded
IT	Vendor and Consulting Contracts and Service Agreements	SOX	Corporate	Term of contract plus 3 years

Legal

Category	Document Name	Class	Location	Retention Period
Legal	1933 and 1934 Act Filings	Public	Corporate	Indefinitely
Legal	General Legal Correspondence	Internal Use	Corporate/Field	Current plus prior year
Legal	Acquisition, Divestiture and Merger Agreements and Due Diligence Information	Restricted	Corporate	Indefinitely
Legal	Board/Committee Meeting Materials	Restricted	Corporate	Indefinitely
Legal	Real Estate Title & Survey Related Documents	Confidential	Corporate/Field	For the ownership of the property plus 7 years
Legal	Legal Entities/Minute Books/Certificates of Incorporation/By-laws/Minutes and Consents	Confidential	Corporate	Indefinitely
Legal	Memoranda/Written Legal Advice	Confidential	Corporate/Field	Indefinitely
Legal	Political Contribution Request Forms	Confidential	Corporate	Indefinitely
Legal	Republic and Vendor Contracts and Service Agreements	Confidential	Corporate/Field	Life of contract plus 3 years
Legal	Department of Justice Compliance Project	Confidential (or as required by the Legal department)	Corporate	Through 12/31/2011 (or as determined by legal department)
Legal	Litigation files (at law firms)	Restricted	At law firm	10 years after litigation has concluded

Maintenance

Category	Document Name	Class	Location	Retention Period
Maintenance	Manifests for Waste Oil or Other Hazardous Waste	Public	Field	Indefinitely
Maintenance	Dossier Work Orders	Internal Use Only	Field	3 prior years plus 6 months after vehicle disposal
Maintenance	Maintenance Files (Brake Inspections and Repairs)	Internal Use Only	Field	3 prior years plus 6 months after vehicle disposal
Maintenance	PMI forms	Internal Use Only	Field	3 prior years plus 6 months after vehicle disposal
Maintenance	Warranty Claims	Internal Use Only	Field	3 prior years plus 6 months after vehicle disposal
Maintenance	Vehicle Condition Reports (VCRs)	Internal Use Only	Field	Current month plus 90 days
Maintenance	Maintenance Training Log	Internal Use Only	Field	Term of employment plus 7 years
Maintenance	Mandatory Maintenance Personnel Training	Internal Use Only	Field	Term of employment plus 7 years
Maintenance	Equipment Titles	Confidential	Field	For the life of the equipment or until sold or otherwise disposed
Maintenance	Brake Certifications - In Personnel Files	Confidential	Field	Term of employment plus 7 years
Maintenance	Dossier and Lawson Reports, Including Monthly Inventory - Electronic	Internal Use only	Field	7 years
Maintenance	Vehicle History Report - Electronic	Internal Use Only	Field	7 years
Maintenance	Dossier POs - Electronic	Confidential	Field	7 years

Market Development

Category	Document Name	Class	Location	Retention Period
Market Development	Transaction File:	Confidential	Corporate/Field	If deal closed, indefinitely. Otherwise, 7 years.
	Closing Notice			
	Contract Checklist			
	Disposal Maps			
	Letter of Intent			
	Transaction-related Memorandums			
	News Clipping			
	Offer Letter			
	Offering Memorandum			
	Post Transaction Review			
	Pro forma Models			
	Project Execution Plan			
	Project Feasibility Analysis			
	Contracts and Agreements			
	Seller Valuation			
	Due Diligence			
	Seller's Information			
	Transaction Analysis			
	Transaction Report			
Market Development	Contract Drafts	Confidential	Corporate	Until contract is executed, then discard all drafts
Market Development	Market Planning and Analysis	Confidential	Corporate	Indefinitely
Market Development	Confidentiality Agreement	Confidential	Corporate	Term of agreement plus 3 years

Operations - Landfill

Category	Document Name	Class	Location	Retention Period
Operations - Landfill	Monthly early register close out - signed off	SOX	Field	Current plus prior year
Operations - Landfill	Monthly gate check summaries - signed off	SOX	Field	Current plus prior year
Operations - Landfill	Scale Tickets	SOX	Field	Current plus prior year
Operations - Landfill	Landfill Quarter End Reports	Internal Use	Field	Current plus prior year
Operations - Landfill	Inspection results	Internal Use	Field	Indefinitely
Operations - Landfill	Landfill Permits (including applications)	Internal Use	Corporate/Field	Indefinitely
Operations - Landfill	Site file: Profile, Permits, Site Development, Expansion and Operating Record	Internal Use	Field	Indefinitely
Operations - Landfill	Special Waste Manifests	Internal Use	Field	Indefinitely
Operations - Landfill	Storm Water Permits (including applications)	Internal Use	Corporate/Field	Indefinitely
Operations - Landfill	Air Permits (including applications)	Internal Use	Corporate/Field	Indefinitely
Operations - Landfill	Environmental monitoring data	Internal Use	Field	Indefinitely
Operations - Landfill	Construction certification (including as built)	Internal Use	Field	Indefinitely
Operations - Landfill	Regulatory submittals and correspondence	Internal Use	Field	Indefinitely
Operations - Landfill	Landfill Data Sheets	Internal Use	Corporate/Field	Indefinitely
Operations - Landfill	UOC Rate Files	Internal Use	Corporate/Field	Indefinitely
Operations - Landfill	Financial Assurance Request Forms & Calculations	Internal Use	Corporate/Field	Indefinitely
Operations - Landfill	Monthly fuel system reading or stick reading	Internal Use	Field	Past 12 months
Operations - Landfill	Vendor files	Internal Use	Field	Until superceded
Operations - Landfill	5 Years Capital Plans - Electronic	Internal Use	Corporate/Field	7 years
Operations - Landfill	Periodic Waste Tonnage Reports - Electronic	Internal Use	Field	7 years
Operations - Landfill	Lawson Essbase Landfill Tons Report - Electronic	Restricted	Corporate	7 years
Operations - Landfill	Lawson Essbase Transfer Station Report - Electronic	Restricted	Corporate	7 years
Operations - Landfill	Daily PC Scales Report package - Electronic	Restricted	Field	7 years
Operations - Landfill	Monthly PC Scales Report package - Electronic	Restricted	Field	7 years
Operations - Landfill	Compliance Database - Electronic	Confidential	Corporate/Field	7 years
Operations - Landfill	Notice of Violations (NOV)	Confidential	Corporate/Field	Indefinitely
Operations - Landfill	Other Waste Manifests	Internal Use	Field	Indefinitely

Operation-Collections

Category	Document Name	Class	Location	Retention Period
Operations - Collections	Traffic Citations	Internal Use	Field	2 years following resolution
Operations - Collections	Driver Logs (Electronic/Hard copies), including DOT files	Internal Use	Field	Hard copy: 6 months Electronic: 7 years
Operations - Collections	Route Smart Benchmark Reports	Confidential	Field	2 years
Operations - Collections	Route Smart Solutions	Confidential	Field	Current year plus prior year
Operations - Collections	Monthly fuel system reading or stick reading	Confidential	Field	Past 12 months
Operations - Collections	ROI Model approved by AP and AC	Confidential	Field	Current version
Operations - Collections	ROI Model (customer specific)	Confidential	Field	Life of customer contract
Operations - Collections	RQR (Revenue Quality Review) Reports	Confidential	Field	Current year plus prior year
Operations - Collections	Notice of Violations (NOV)	Confidential	Corporate/Field	Indefinitely

Payroll

Category	Document Name	Class	Location	Retention Period
Payroll	Employee Timecards (paper copy) signed by EE	Confidential	Field	Current plus 3 prior years
Payroll	Payroll Hours Reconciliation Sheet	Confidential	Field	Current plus 3 prior years
Payroll	Bonus payment calculations and worksheets	Confidential	Field	Current plus 3 prior years
Payroll	Incentive Wage calculation worksheets	Confidential	Field	Current plus 3 prior years
Payroll	Sales commissions calculation and worksheets	Confidential	Field	Current plus 3 prior years
Payroll	Weekly Payroll Reports (Signed Off) - PR141, Employee Change Audit, Kronos Production Pay Report, Pay Rate Exception Audit Report	Confidential	Field	Current plus prior year
Payroll	Kronos Time Records - Electronic	Confidential	Corporate	7 years
Payroll	W-2s	Confidential	Corporate	Current plus 3 prior years

Risk Management

Category	Document Name	Class	Location	Retention Period
Risk Management	Certificate of Insurance for Outside Repair Contractors	Internal Use	Field	Indefinitely
Risk Management	Certificate of Insurance for Republic and its Subsidiaries	Internal Use	Corporate	Term of policy plus 3 years
Risk Management	Litigation files (at law firms)	Restricted	At law firms	10 years after litigation has concluded
Risk Management	Settlement Authority documents - Electronic	Restricted	Corporate	7 years
Risk Management	Risk Register and Plan	Restricted	Corporate	Current plus 5 years
Risk Management	Claim File	Confidential	Third-party administrator	10 years after claim is closed
Risk Management	Bank statements for claims deposits/payments	Confidential	Corporate	Current plus 7 prior years
Risk Management	Bom Ambiente RM binders	Confidential	Corporate	Indefinitely
Risk Management	Insurance Policies	Confidential	Corporate	Indefinitely
Risk Management	Insurance Policy Applications	Confidential	Corporate	Indefinitely
Risk Management	Risk Awareness Training Materials	Confidential	Corporate	Current plus prior version
Risk Management	Accident Related Documents: - Internal Accident Investigation Form - Personnel File - Training File - Driver Qualification Form - Vehicle Condition Reports (VCRs) - Maintenance Records - PC Scale Ticket	Confidential	Field	Pulled and maintained for 10 years until case or claim is closed

Safety

Category	Document Name	Class	Location	Retention Period
Safety	Material Safety Data Sheets (MSDS) - Active and Obsolete	Public	Field	30 years following determination of obsolescence
Safety	Facility Inspections	Internal Use	Field	Current plus prior year
Safety	Republic Safety Operation Program (ReSOP) Observations	Internal Use	Field	Current plus prior year
Safety	Industrial Hygiene Air Survey Results	Internal Use	Field	Indefinitely
Safety	Industrial Hygiene Noise Survey Results	Internal Use	Field	Indefinitely
Safety	Safety Training:			
	- Attendance Logs for Annual/Monthly Training (All Employees)	Internal Use	Field	Current plus prior year
	- Materials and Videos	Internal Use	Field	Until superseded
	- New Hire/Orientation Training (Personnel Files)	Confidential	Field	Term of employment plus 7 years
Safety	DOT - Recordable Accident Register	Confidential	Field	3 years
Safety	DOT Drivers Hour Log (Driver's Duty Status Record)	Confidential	Field	6 months
Safety	OSHA 300 Log (Workpaper Injuries)	Confidential	Field	5 years
Safety	OSHA 301 Supplemental Reports by Employee	Confidential	Field	Term of employment plus 7 years
Safety	OSHA Written Compliance Programs	Confidential	Field	Indefinitely
Safety	Employee Medical Records (Annual Audiograms, Respirator Medical Certifications)	Confidential	Field	Term of employment plus 30 years
Safety	Division Safety Manual and Safety Training Manual	Confidential	Field	Until superseded
Safety	AL/GL and Property Damage Accident Reports	Confidential	Field	7 years from date of accident

Sales

Category	Document Name	Class	Location	Retention Period
Sales	New and Lost Customer Report (signed)	SOX	Field	Current plus prior year
Sales	Service Agreements (signed)	Restricted	Field	Life of contract plus 3 years
Sales	Market Place Sales Review by Division	Confidential	Field	Current version
Sales	Street Price List and Related Assumptions/Facts	Confidential	Field	Current plus prior version
Sales	Commercial, Industrial and Residential New Customer Report (RSI) - Electronic	Confidential	Field	7 years
Sales	CRMS Reports - Electronic	Confidential	Field	7 years
Sales	Lawson-Defection Report - Electronic	Confidential	Field	7 years
Sales	Lawson-Price Increase (PI) Trend Report - Electronic	Confidential	Field	7 years
Sales	Lawson-Sales Trend Report - Electronic	Confidential	Field	7 years

SOX - Internal Audit

Category	Document Name	Class	Location	Retention Period
SOX	Corporate Controls Testing	Internal use	Corporate	7 years
SOX	Corporate Peer Review	Internal use	Corporate	7 years
SOX	Deficiency Analysis	Internal use	Corporate	7 years
SOX	Entity-Level Assessments	Internal use	Corporate	7 years
SOX	IT General and Application Control Matrices	Internal use	Corporate	7 years
SOX	IT General and Application Control Testing Workpapers	Internal use	Corporate	7 years
SOX	Peer Review Checklists and Exception Documentation	Internal use	Corporate	7 years
SOX	Remediation Testing	Internal use	Corporate	7 years
SOX	SAS 70 Analysis	Internal use	Corporate	7 years
SOX	Segregation of Duties Matrix	Internal use	Corporate	7 years
SOX	Semi-annual Self-assessment	Internal use	Corporate	7 years
SOX	SOX Narrative Documentation (includes narratives, summaries and flowcharts)	Internal use	Corporate	7 years
Internal Audit	Audit Folders (containing workpapers, audit reports, correspondence, etc)	Internal use	Corporate	7 years
Internal Audit	Special Projects (workpapers, reports and supporting documentation)	As determined by the Legal Dept or project owner	Corporate	As determined by the Legal Dept or project owner

Treasury

Category	Document Name	Class	Location	Retention Period
Treasury	Weekly Cash Forecast	SOX	Corporate	Current plus prior year
Treasury	Daily Cash Book	Confidential	Corporate	7 years
Treasury	Bank Fee Reports	Confidential	Corporate	7 years
Treasury	Financial Assurance Files (closure and post closure)	Confidential	Corporate/Field	Indefinitely
Treasury	Letters of Credit Files	Confidential	Corporate	Term of letter plus 3 years
Treasury	Tax Exempt Bond Reimbursements and Supporting Documentation	Confidential	Corporate	Term of bond plus 7 years
Treasury	Debt Compliance Certificates	Confidential	Corporate	Term of debt plus 3 years
Treasury	Account Signatory files	Confidential	Corporate/Field	Two years after the account is closed
Treasury	Bank Service Agreements	Confidential	Corporate	Term of contract plus 3 years